

**REPLY COMMENTS OF THE
CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION ON THE JOINT STAFF
PROPOSAL FOR A GHG REPORTING PROTOCOL**

In accordance with the *Administrative Law Judges' Ruling Regarding Comments on Staff Reporting Proposal* ("ALJ Ruling") filed June 12, 2007, in the R.06-04-009, and pursuant to the Rules of Practice and Procedure of the Public Utilities Commission ("CPUC") of the State of California, the California Municipal Utilities Association ("CMUA") hereby files these Reply Comments to parties opening comments on the *Joint California Public Utilities Commission and California Energy Commission Staff Proposal for an Electricity Retail Provider GHG Reporting Protocol* ("Staff Proposal"). CMUA also files these Comments with the California Energy Commission ("CEC") in Docket 07-OIIP-01. In these Reply Comments, the CPUC and CEC will collectively be called the "Joint Agencies."

CMUA reaffirms at this time, its desire and intent to participate collaboratively in the proceeding for the purpose of developing a workable recommendation for Assembly Bill 32 ("AB 32") implementation that is equitable and in conformance with the intent of AB 32. CMUA approaches this proceeding a manner in which all ideas must be explored using solid reasoning and evidence.

I. ACCURACY IS A KEY CRITERION

CMUA believes that there is a common thread running through a majority of the Opening Comments – the recognition of need for an accurate tracking mechanism. An accurate reporting and tracking mechanism will mitigate and perchance eliminate many problems concerning contract shuffling, gaming, leakage, double-counting, default emission factors, or unspecified resource emission factors.

"LADWP supports the State's efforts to work with other states to develop a WECC-wide generation information system that would allow regulators to identify power that has been sold for another purpose, and thereby minimize leakage and contract shuffling."¹

"Transportability of reporting protocols developed by California is a desirable objective. Chief among the characteristics needed to facilitate transportability is accuracy of mass emission values for each of the six gases."²

¹ Comments of the Los Angeles Department of Water and Power (LADWP) at 12.

² Comments of the Sacramento Municipal Utilities District (SMUD) at 6.

“SCPPA supports the criteria [of accuracy, consistency, simplicity, transparency, minimizing unintended consequences, setting appropriate policy signals, and expandability] presented by the Joint Staff, particularly, and SCPPA applauds the Joint Staff’s decision to put the objective of accuracy first on the list.”³

“CMUA encourages the use of a database in which both in-state and out-of-state suppliers may demonstrate an actual emission factor for their portfolios or unit-specific facilities.”⁴

“Given the inherent limitations of the Staff Proposal, the document should provide more discussion of the path to a comprehensive measurement system required for reporting under AB 32.”⁵

“PG&E instead recommends that further workshops be scheduled to discuss and allow for comment by interested parties on the various sources of data and calculations that would support the emissions rates and factors. . . . California and states that deliver power to and from California should implement uniform and consistent methodologies for quantification of emissions associated with power imports and exports.”⁶

“While it will be helpful to gain experience with GHG emissions reporting using near-term reporting options that depend upon existing sources of information, California should also use the interim period to begin developing a tracking system to overcome the deficiencies that exist in currently available information.”⁷

“It is the strong belief of the Green Power Institute that in order to be successful, greenhouse gas reduction programs at any jurisdictional level (state, regional, federal, international) will require electronic tracking of greenhouse-gas emissions from their source to their retirement in conjunction with approved allowances. While an interim tracking protocol of the kind described in the *Joint Proposal* can be employed until a regional electronic tracking system can be put into service, we believe that the efforts of both Commissions involved in the *Joint Proposal*, as well as the ARB, should be geared towards creating a regional electronic greenhouse gas tracking system from the beginning.”⁸

“There are serious consequences to the integrity of GHG markets if the California reporting protocol is inaccurate due to estimates and assumptions. The accuracy of the reporting protocol advanced in the Staff Proposal is poor, as has been discussed above in Section II.A. One of the consequences of this inaccuracy is that other states may not allow participants in their markets to trade with California entities if it is perceived that that California’s emissions allowances will offset more than the face value of the allowances sold due to inaccurate underreporting of GHG emissions in California.”⁹

³ Comments of the Southern California Public Power Authority (SCPPA) at 1-2. Also, the majority of SCPPA’s comments concern the accuracy of emission factors.

⁴ Comments of CMUA at 5.

⁵ Comments of San Diego Gas & Electric at 3.

⁶ Comments of Pacific Gas & Electric at 5.

⁷ Comments of the Natural Resources Defense Council-Union of Concerned Scientists (NRDC-UCS) at 4-5.

⁸ Comments of the Green Power Institute at 3.

⁹ Comments of Southern California Edison at 30.

“AReM believes that it is appropriate to have a regional outlook in developing a system for tracking and reporting GHG emissions, and AReM strongly urges the Commission and the CEC to work with agencies in other states to that end. . . . Moreover, it should be explicitly recognized that many, if not most, of the complexities in the proposed reporting approach would go away if a larger, regional tracking and reporting infrastructure is developed.”¹⁰

II. THE CRITERION OF ACCURACY MUST BE APPLIED CONSISTENTLY

As stated in CMUA’s Opening Comments, CMUA agrees with the position of the Natural Resources Defense Council-Union of Concerned Scientists (NRDC-UCS) in that the Staff Proposal criteria of accuracy, minimizing unintended consequences, and the setting of appropriate policy signals are very important.¹¹ However, in CMUA’s assessment of the reasoning and evidence, the NRDC-UCS proposal to use *ex post* calculations of emission factors would violate all of these criteria as well as the Staff Proposal criterion of consistency.¹² CMUA reasons that all of these important criteria will more likely be achieved by using the most accurate emission factors possible in a consistent application across all time periods and geographical boundaries.¹³ This consistency must span the time frame between 1990 baseline and today, as well as from year to year going forward.¹⁴ As stated by the Morgan Stanley Capital Group, “[i]t is difficult to see how market participants could enter into contracts or plan “carbon budgets” if they are to be subject to *ex post* calculations of assigned emissions rates. The market needs the predictability associated with an *ex ante* approach.”¹⁵ This uncertainty will exist, even if the retail providers have the option to purchase allowances or utilize flexible compliance mechanisms to cover their *newly recognized* compliance obligations when *ex post* numbers are released after the compliance year.¹⁶ The retail provider will have already priced the transaction ahead of time and there will be no mechanism for recouping the costs.

NRDC-UCS state that “if emissions factors are assigned *ex post* on an annual basis, retail providers will know the emissions factor determined *ex post* for the previous year and can use that emissions factor for planning purposes, since the emissions factor in the following year is unlikely to

¹⁰ Comments of the Alliance for Retail Energy Markets at 5.

¹¹ CMUA at 4-5, NRDC-UCS at 3.

¹² NRDC-UCS at 6-8.

¹³ *See* SMUD at 5-7.

¹⁴ LADWP at 3-5.

¹⁵ Comments of Morgan Stanley Capital Group at 6-7.

¹⁶ NRDC-UCS at 7.

substantially deviate from that of the prior year in most circumstances.”¹⁷ According to this argument, however, the ex post method would provide no “substantial” benefit since the numbers wouldn’t substantially change. Insofar as emission factors are unlikely to substantially deviate from year to year, why would an ex post method be any more accurate than an ex ante method after the first ex post calculation was made? And, if that is true, then why shouldn’t these emission factors be calculated before the AB 32 compliance program even begins so that the initial emission factors represent factors with the highest accuracy possible? If the compliance program begins with numbers that are as accurate as possible, then the calculations for subsequent years will differ minimally, rarely, or not at all. Moreover, couldn’t the ex post approach create a perverse incentive whereby the retail providers do not truly know which resources to select and may possibly forgo procuring a lower emitting resource for one that is *actually* higher?

In the event the Joint Agencies desire to provide more market certainty than possible with an ex post calculation, NRDC-UCS suggest a hybrid system using ranges of ex ante emission factors for each region.¹⁸ CMUA reasons that ex ante ranges do not satisfy the accuracy criterion either, and in addition, may pose problems with wholesale transactions which will then be priced at the high end and push the market toward illiquidity.

NRDC-UCS also suggest in the absence of using ex post emission factors, that a default rate for natural gas plants be set at the emission factor of the least efficient natural gas plant (1640 lbs CO₂e/MWh). Once again, using the highest value is not supported by the evidence, i.e., the available records of actual plant emissions. CMUA also reasons that this estimation would erase any distinction between resources that are truly high emitters and those that are not. In actuality, this proposal could create the unintended consequences that NRDC-UCS seek to avoid and defies the criterion of accuracy. Therefore, a default to using the highest value for unspecified resource emission factors may not always lead to real and permanent reductions in statewide GHG emissions as required by AB 32.

Regardless of whether ex post or ex ante emission factors are used, NRDC-UCS “recommend that these factors be updated annually, to account for potentially significant inter-annual changes such as new plant additions or retirements and hydro variability.”¹⁹ CMUA agrees. However, CMUA would further recommend that an ex ante annual update be based not on a single 12-month period, but on a historical 3-year rolling average in order to moderate seasonal/annual fluctuations in hot weather

¹⁷ NRDC-UCS at 7. The oft quoted analogy of driving a car by looking in the rear view mirror comes to mind.

¹⁸ NRDC-UCS at 8.

¹⁹ NRDC-UCS at 6.

and available hydro and changes in generation resources. For example, the first reporting period would use the average of historical year 1, year 2, and year 3. For the following reporting period, year 1 would drop out and year 4 would be added, and so on. This process would allow new annual data on generation, fuel consumption, and emissions to be readily input into the equation and more accurately characterize the resources contributing to unspecified power.

III. CONCLUSION

In light of these common views and the dependence of a successful AB 32 compliance program upon having known emission rates in the western interconnect, CMUA asks the Joint Agencies to place a very high priority on developing recommendations for an accurate tracking system using consistent calculation protocols across all time periods and geographical regions.

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Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the attached:

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on all known parties to R.06-04-009 by transmitting an e-mail message with the document attached to each party named in the official service list. I served a copy of the document on those without e-mail addresses by mailing the document by first-class mail addressed as follows:

See attached service list

Executed this 10th day of July 2007, at Sacramento, California.

A handwritten signature in black ink, appearing to be 'RB' or similar initials, written in a stylized, cursive manner.

Ryan Bernardo

Service List R.06-04-009, updated July 9, 2007

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