DOCKET
07-OIIP-1
DATE AUG 3 0 2007
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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.	Rulemaking 06-04-009 (Filed April 13, 2006)

ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION
OF THE STATE OF CALIFORNIA

In the Matter of: AB 32 Implementation: Greenhouse Gases	Docket 07-OIIP-01

REPLY COMMENTS OF THE
LOS ANGELES DEPARTMENT OF WATER AND POWER
ON THE PROPOSED DECISION: INTERIM OPINION ON REPORTING AND TRACKING OF GREENHOUSE GAS EMISSIONS IN THE ELECTRICITY SECTOR

August 30, 2007

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In accordance with Rule 14 of the Rules of Practice and Procedure of the Public Utilities Commission ("CPUC" or "Commission") of the State of California, the Los Angeles Department of Water and Power ("LADWP") hereby files the following Reply Comments submitted in response to the Proposed Decision (PD) to adopt the "Interim Opinion on Reporting and Tracking of Greenhouse Gas Emissions in the Electricity Sector ("Interim Opinion") issued August 15, 2007, in Rulemaking 06-04-009. LADWP also files these Comments with the California Energy Commission ("CEC") in Docket 07-OIIP-01. The LADWP supports the comments submitted by the Southern California Public Power Authority (SCPPA), the Sacramento Municipal Utility District (SMUD), the Northern California Power Agency (NCPA), and the California Municipal Utility Association (CMUA).

I. INTRODUCTION

The LADWP has reviewed the comments from several parties and is concerned that the Proposed Decision to adopt the Interim Opinion on Reporting and Tracking Greenhouse Gas Emissions in the Electricity Sector, including the Proposed Electricity Sector Greenhouse Gas (GHG) Reporting and Tracking Protocol (Protocol) that will be adopted by the CPUC and CEC in September 2007 has not adequately evolved into an effective and well-designed proposal. The Protocol has not received full public discussion, and only one public workshop in April 2007 was conducted to initiate the discussion about how best to address emissions tracking and reporting.

The parties have been rushed to review and provide comments without the benefit of sufficient time to evaluate and analyze the potential impacts of the final proposed Protocol on wholesale markets, development of renewable energy resources, system reliability, and consumer electricity prices, not to mention the legality of some of the Protocol's requirements.

The CPUC/CEC staff concerns regarding contract shuffling warrant full public discussion and coordination with other states, including those participating in the Western Climate Initiative, to determine how best to structure the program and institute mechanisms to address this potential outcome. The LADWP agrees with several parties' comments that the Protocol is not the appropriate vehicle to address this concern. This Protocol will become the foundation upon which the electricity sector will depend to ensure environmental integrity of the emission reductions that are needed to make AB 32 successful. The critical issues raised by various parties remain unresolved and inadequately addressed by the Protocol, and as a result, weaken the Protocol as a sound tool to facilitate emission reductions. The unintended consequences that may result from its implementation are severe and work against the spirit of AB 32.

As such, the LADWP supports SCPPA's comments that the CPUC and CEC take the time necessary to refine the Protocol to make it a sound and workable tool to accurately and consistently track and report GHG emissions from specified and unspecified sources. Additionally, the LADWP recommends that additional workshops be conducted to fully evaluate, resolve and establish appropriate default regional emission factors.

II. COMMENTS

A. <u>The retail provider reporting protocol for owned power plants should report based on actual amount of energy received (MWh) and not by proportional ownership or entitlement share</u>

Several parties objected to the Interim Opinion's requirement that emissions from wholly and partially-owned power plants be attributed based on its proportional ownership share, not the amount of electricity consumed into California. This requirement is not consistent with the legislative intent of AB 32 which states that California's mandatory reporting program shall, "Account for GHG emissions from all electricity consumed in the state, including transmission and distribution losses from electricity generated within the state or imported from outside the state." [AB32 Section 38530 (b)(2)]. Assuming emissions content based on ownership share rather than on actual generation penalizes owners for emissions that have not necessarily been created and may encourage maximal GHG production from those resources (i.e. generating at the full ownership share) if reporting does not recognize an entity for reducing the actual amount of emissions associated with generation consumed to serve California load.

B. <u>Use of default emissions factors for specified sources is unsound environmental policy and may result in unintended consequences</u>

The LADWP supports the comments from several parties that the use of less accurate default emission factors for new contracts with existing specified generation sources should be removed from the Proposed Decision. It is poor public policy, directly contradicts the State's Renewable Portfolio Standard, and may have several unintended consequences. The data submitted for mandatory greenhouse gas reporting should be consistent with what is reported on a retail provider's Power Content

Label. The Interim Opinion would fail to do this if less accurate default emission factors are used for specified sources.

Additionally, SB 1368 established the greenhouse gas emission performance standard that restricts long-term financial investments in baseload generation to sources that emit no more than 1,100 lbs/MWh. This law, in effect, ensures that California retail providers procure clean generation for all new long-term contracts (5+ years), irrespective of whether those contracts are for new or existing low-GHG emitting generation based on the PD's arbitrary cut-off date of January 1, 2008.

The LADWP is aware of several merchant renewable projects that are scheduled to go on-line during the last quarter of 2007. These projects would have reported GHG emissions based on the default emission factors. In the extreme, some of these renewable energy projects might be abandoned if their owners cannot market their output as other than non-specific source energy.

Investors in eligible renewable zero-GHG emitting generation will be penalized for their early actions to invest in clean generation prior to 2008, by limiting the marketability of their resources to only existing power purchase agreements that are renewed without interruption. It was not the intent of AB 32 that this be the appropriate credit for voluntary early actions to reduce GHG emissions. A retail provider would be discouraged from entering into a long-term power purchase agreement with an existing renewable zero-GHG emitting generator if they were required to attribute a higher default emission factor.

It is unclear why this type of financial commitment to procure both the underlying energy and the environmental attribute in the form of a Renewable Energy Certificate

(REC) would be discouraged. The use of a default emission factor for known sources like renewable generators would be incompatible with the WREGIS system that is designed to ensure the environmental integrity of the renewable resource that is procured and that it is not double-counted.

At this time, it is undetermined whether AB 32 regulations will allow compliance through the purchase of unbundled RECs. A REC should reflect all the environmental attributes of the specific underlying renewable resource. If unbundled RECs are allowed to be used for AB 32 compliance, would RECs from existing renewable resources be discounted? In other words, would RECs from pre-January 1, 2008 renewable resources be worth less than RECs from renewable resources brought on-line after January 1, 2008? That would be the equivalent of, and as illogical as, suggesting that a twenty dollar bill that was printed in 2000 is worth only ten dollars, but a twenty dollar bill that was printed in 2001 is worth twenty dollars.

It is excessive to assume that a retail provider who enters into a power purchase agreement for an existing zero-GHG renewable resource (i.e. wind) at a higher cost than fossil generation (i.e. natural gas), will be required to use a higher default regional emission factor (i.e. 1,075 lbs/MWh for purchases from Southwest unspecified sources), <u>and</u> then purchase emission allowances in the amount necessary to cover that procurement at 1,075 lbs/MWh.

This nonsensical approach values this financial commitment to both the underlying energy and the environmental attribute at the same level as null power and unspecified power, even though it would cost the retail provider significantly more. Consequently, the retail provider would be encouraged to forego entering into a power purchase agreement for that existing renewable resource because it would actually be less costly to procure null power or unspecified power and could instead obtain the same amount of emission allowances without having to pay the premium for that renewable resource. This approach is unsound environmental policy in that it fails to provide the appropriate policy signals to encourage early action and support renewable energy development, which are key to reducing GHG emissions.

C. Firming power for intermittent renewable resources should also recognize net deliveries where the firmed energy is returned

The LADWP recognizes the need for firming intermittent renewable energy resources and has entered into power purchase agreements for such types of resources. The LADWP has taken a position that, where feasible, the "brown" power that is used to firm a renewable resource should be eventually returned to the generator as brown energy under a separate energy schedule at a different time, with the end result being that the net energy received is only the renewable energy. While this may not be the case for all firmed renewable energy contracts, the LADWP requests that the CPUC/CEC include in the Interim Opinion a recognition of this netting effect when it occurs, and attribute the returned brown energy to the generator and not to the California retail provider that received it as part of the firmed energy delivery.

As the Interim Opinion states, contracts for power from a specified source may be structured such that the seller will fill in, or "firm" power from the unspecified plant with power from unspecified sources from potentially different locations during planned and unplanned outages, start-ups, ramping up and down, and other operating conditions that limit the plant's output. CPUC/CEC recommends that CARB attribute the emission factor of the contracted-for facility to substitute power, up to 15 percent of the energy delivered. Since the interim opinion does not specify a time frame with respect to calculation of the 15 percent energy delivered data, LADWP recommends that retail providers collect the data on a monthly basis.

D. <u>Emissions associated with transmission losses upstream from a point of delivery is impossible to calculate for unspecified sources</u>

The LADWP agrees with SDG&E that the reported generation or power purchased would already include transmission losses for in-state and out-of-state specified purchases. For purchased power, the retail provider's responsibility for reporting transmission and distribution losses should begin at the point of delivery where it assumes title and responsibility for the power. While it is possible to quantify total transmission and distribution losses for power from a known generation source, it is not feasible to quantify losses upstream from the point of delivery for unspecified power purchases where the generation source is unknown.

The LADWP recommends that the PD be revised to reflect the following:

1) <u>Transmission and distribution losses from specified sources:</u> Emissions should be reported based on MWH received at the generation source, which includes transmission and distribution losses.

2) <u>Transmission and distribution losses from unspecified sources:</u> Emissions should be reported based on MWH received at the first point where the energy lands in the load-serving entity's name.

In response to the Marketer Reporting Protocol that requires transactions to be verifiable via NERC e-tags, Powerex commented that only a limited number of fields are relevant for the purposes of tracking GHG emissions associated with a particular transaction. Powerex recommended that reporting be limited to only the necessary fields in the NERC e-tag.

The LADWP has taken the strong position in our filings to date with the CPUC/CEC that NERC e-tags should not be used for any purposes outside managing transmission reliability. They should not be used for GHG source tracking, including transmission losses, because they are an inaccurate tool for that purpose for several reasons that have already been stated in the record of this proceeding. This includes the fact that they are vulnerable to manipulation after a transaction has been negotiated to reflect a source different from what may have been dispatched to support that transaction.

The WECC handles transmission losses differently than the way it is performed in the Eastern Interconnection. NERC e-tags in the WECC Region reflect loss transfers under separate e-tags, and only when those losses are compensated for physically and not financially. WECC entities are allowed to tag losses in this way by a special dispensation from NERC. As a result, it is not obvious what the losses are pertaining to a particular transaction by using an e-tag. The losses can be delivered on another path and/or at another time. The losses can also be settled financially, in which case no NERC e-tag is generated at all.

E. Reporting requirements should avoid negative impacts to the fluidity and reliability of wholesale power markets in the WECC

California is part of the WECC electric grid, which was designed to serve load throughout the western portion of North America. The LADWP agrees with other parties' comments that California's GHG emissions program should not impose requirements that negatively impact the fluidity and reliability of the WECC wholesale power markets. The Protocol proposes that retail providers list all bilateral purchases of power, and power received as part of an exchange agreement from unspecified sources, as measured at the first California point of delivery at which the reporting entity took possession of the power, aggregated by counterparty. The LADWP believes that aggregation by counterparty is not necessary in order to calculate the associated GHG emissions. As long as a retail provider knows the geographic location from where the energy is coming from, then the appropriate default emission factor can be applied. Counterparty identification does not necessarily lead to the determination of generation source.

There are confidentiality issues with respect to identifying counterparties in such purchase agreements. For example, many purchase contracts are done under the Western States Power Pool Master Agreement. A contractual review would likely need to be performed to determine if aggregated counterparty information can be released.

The proposed requirement uses the term "exchange agreement" which is defined in Section 1.1.4. The proposed definition does not differentiate between a wheel and a buy-sell exchange agreement or describe if the exchange is simultaneous. LADWP agrees with other parties' comments that wheel exchanges should not be included in the definition as the energy does not land in California.

Section 4.1 - Imports

The Protocol proposes that marketers report all imported electricity with a final point of delivery in California that marketers had possession of at the first point of delivery inside Califomia; summed separately for each counterparty supplying the power. In addition, marketers are to "Report unspecified sources summed by region of origin." LADWP requests that CPUC/CEC specify how marketers can specify the region of origin. The location of the source, as identified on the NERC e-tag, may not necessarily have been the actual point of generation.

Regarding "the first point of delivery in California", as stated previously, LADWP recommends that this point be further identified. What if the California entity bought the energy out of state and then imported it into California? Where exactly is that point, as seen by the CPUC/CEC? For example, if LADWP purchases energy at Mead 230, are the losses accounted for at LADWP's load center or at Victorville? Also, identification of the first point of delivery is important because the difference in losses, which the CPUC/CEC proposes to regulate, can be significant (in LADWP's case, up to 7.5% of the imported energy). LADWP also questions how to report losses in the case where counterparties return loss energy to a marketer at different locations and/or at different times. In this case, the marketer could conceivably report that the original transaction had 0% losses and then report the loss return separately (with losses on these losses).

LADWP requests clarification as to what CPUC/CEC intends the "region of origin" to be: Is the "region of origin" the most distant location where the counterparty had possession of the energy immediately before selling it to the California entity? Or is it the nearest point? The location of the source as identified on the e-tag need not have been the actual point of generation.

<u>Section 4.2 - Exports</u>

LADWP's comments and questions are similar to those in Section 4.1 above as applied to the "region of destination" instead of the "region of origin" and "the last California point of delivery" rather than "the first California point of delivery." Also, although the Protocol states that exports of electricity will be reported for "each counterparty supplying the power", perhaps it meant to state "each counterparty *receiving* [emphasis added] the power." LADWP requests clarification on this statement.

F. **Geographic boundaries should be consistent with the WECC boundaries for Pacific Northwest and Southwest to allow for smoother transition to a regional program**

The Pacific Northwest region is defined in Section 1.1.9 as including Washington, Oregon, Idaho, Montana, and British Columbia. The Southwest region is defined in Section 1.1.13 as including Arizona, Nevada, Utah, Colorado, and western New Mexico. LADWP requests information as to how the geographic lines were drawn. The proposed definitions do not match the geographic regions in the WECC. For example, in the Pacific Northwest, Alberta, Canada and Wyoming are not included in the CPUC/CEC's definition. In the Southwest, northern Mexico is not included. If the goal is to track imports from WECC region into California, LADWP recommends that the regions be compatible with WECC boundaries and that balancing authorities are not split along any regional or political boundaries.

G. **Submission process should require one report be submitted to the Air Resources Board only**

The LADWP agrees with other parties' comments that the submittal of the annual GHG emissions report should be submitted to the regulatory agency that has jurisdiction to implement and enforce AB 32. That agency is the California Air Resources Board. Simultaneous submittals to the CPUC and CEC appear to be unnecessary, and suggest that the three agencies have equal responsibility for regulating and enforcing AB 32. The LADWP supports the State's efforts to coordinate review and verification of data submittals with the CPUC and CEC; however that should be performed internally.

III. CONCLUSION

The LADWP appreciates the opportunity to provide these reply comments to the CPUC and CEC for your consideration.

Dated: August 30, 2007 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, updated August 29, 2007. See attached 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:

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Executed this 30^{TH} day of August 2007, at Los Angeles, California.

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