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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)
and	
Order Instituting Informational Proceeding AB-32	CEC Docket Number 07-OIIP-01

RESPONSE OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) AND SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) ON ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING COMMENTS AND NOTICING WORKSHOP ON ALLOWANCE ALLOCATION ISSUES

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I. INTRODUCTION AND BACKGROUND

In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (the "Commission") and the Administrative Law Judges' Ruling Requesting Comments on Allowance Allocation issues and Notice of Workshop (the "ALJ Ruling"), dated October 15, 2007, San Diego Gas & Electric Company ("SDG&E") and Southern California Gas Company ("SoCalGas") hereby submit the following responses to the questions posed by the ALJ Ruling.

On April 13, 2006, the Commission adopted its *Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies* (the "OIR"). The OIR indicated that the rulemaking would be split into two phases. In Phase I of the rulemaking, the Commission considered threshold issues related to adoption of a Greenhouse Gas ("GHG") emissions performance standard ("EPS"). Phase II now focuses on development of joint recommendations regarding regulatory treatment of GHG emissions in the electricity and natural gas sectors to be presented by the Commission and the California Energy Commission ("CEC") to the California Air Resources Board ("CARB"), in accordance with Assembly Bill ("AB") 32.[1/] Because Phase II focuses upon development of guidelines to be submitted for CARB's consideration, the OIR further provides for consideration of the emission allowance distribution approach proposed by the Market Advisory Committee ("MAC") for the electric and/or natural gas sectors.[2/]

It is hopeful that developing certain fundamental evaluation criteria could help the Commission analyze the issues surrounding emission allowance allocation-related issues for a deliverer/ first seller approach and also for the natural gas sector, consistent with amendments to the rulemaking adopted in Decision (D) 07-07-018 and D.07-05-059.[3/] While the Commission has not adopted the ultimate design of the GHG regulatory framework for the electricity and natural gas sectors, the questions in this ruling will primarily explore policy issues related to distribution of allowances if a cap and trade system is adopted.[4/]

1/ ALJ Ruling, p. 2.

2/ The MAC Report is available at http://climatechange.ca.gov/documents/2007-06-29_MAC_FINAL_REPORT.PDF.

3/ ALJ Ruling, pp. 1-4.

4/ ALJ Ruling, p. 3.

The ALJ Ruling sets forth specific questions to be addressed which focus on allowance allocations under both the electrical and natural gas sectors.[5] The ALJ Ruling further invites parties to offer comments regarding the final MAC Report criteria and recommendations.[6] SDG&E and SoCalGas support administratively implementing GHG emission allocations and distribution in the most fair, efficient and effective manner that allows the State to achieve its AB 32 GHG reduction and cost-effectiveness targets, while maximizing incentives to reduce emissions and reward early actions that have had the effect of reducing emissions.

II.
RESPONSE TO QUESTIONS

Evaluation Criteria

Question 1: Please comment on each of the criteria listed by the MAC.

a. Reduces the cost of the program to consumers, especially low-income consumers,

b. Avoids windfall profits where such profits could occur,

c. Promotes investment in low-GHG technologies and fuels (including energy efficiency),

d. Advances the state's broader environmental goals by ensuring that environmental benefits accrue to overburdened communities,

e. Mitigates economic dislocation caused by competition from firms in uncapped jurisdictions,

f. Avoids perverse incentives that discourage or penalize investments in low-GHG technologies and fuels (including energy efficiency),

g. Provides transition assistance to displaced workers,

h. Helps to ensure market liquidity.

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[5] *Id.*

[6] *Id.* at p. 1.

Question 1a: Are these criteria consistent with AB 32?

Response 1a: AB 32 contains no specific language concerning allowance allocation criteria. However, AB 32 does generally authorize CARB to utilize "market-based compliance mechanisms" to achieve GHG compliance.[7] The legislation defines such "market-based compliance mechanisms" to include "greenhouse gas emissions exchanges, banking, credits, and other transactions, governed by rules and protocols established by the state board." Market mechanisms will result in the least cost emission reductions. To the extent the state board finds allowance allocations are necessary or desirable to facilitate the achievement of the maximum feasible and cost-effective reductions of greenhouse gas emissions by 2020, the criteria listed by the MAC appear otherwise consistent with AB 32.

Question 1b: Should other criteria be added, such as criteria specific to the electricity and/or natural gas sectors?

Response 1b: Yes, SDG&E and SoCalGas recommend addition of the following criteria:

- Continues to maintain reliability of the electric and natural gas supplies;
- Avoids undue upward pressure on electricity and natural gas prices and basic consumer necessities;
- Treats all technologies the same in allocating allowances; this criteria will maximize incentives to reduce emissions.
- Scales up to a regional and national program;
- Meets established criteria of being cost-effective; technologically feasible; verifiable.

Question 1c: In making trade-offs among the criteria, which criteria should receive the most weight and which the least weight?

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[7] Health and Safety Code section 38505(f).

Response 1c: The criteria for assessing program design features should be arranged in a hierarchy of critical and secondary criteria. First, "mission critical" criteria should be defined for each sector. For the utility sector, safety and reliability should supersede all other criteria. Undue cost impacts on customers should also be level-one criterion. This should be factored into overall design criteria and safety valve mechanisms. In addition, all measures and design features should be screened to ensure that they support the over-arching objectives of AB32 of cost effectiveness (including required systems development and maintenance costs), feasibility and verifiability.

Once those "hurdles" are cleared, other factors should be considered. In the experience of SDG&E and SoCalGas, firm ranking orders and weighting mechanisms for complex, mixed quantitative and qualitative analyses are extremely difficult to develop a priori. The recommended approach would be to first define strong positive points and very negative points relative to the secondary criteria and then use stakeholder processes or other group decision processes and rank program features and measures through a consensus process. Including the additions of SDG&E and SoCalGas the set of secondary criteria would be:

- Guarantees that allocation mechanisms are indifferent to the past and future technology choices of capped entities;
- Mitigates economic dislocation caused by competition from firms in uncapped jurisdictions and ensures cost recovery to price-capped entities;
- Reduces the cost of the program to low-income consumers;
- Impedes windfall profits to firms not taking commensurate action to address climate change;
- Provides ability to scale up to a regional and national program;

- Ensures market liquidity;
- Avoids perverse incentives that discourage or penalize investments in low-GHG technologies and fuels (including energy efficiency) and/or penalize early actions that have had the effect of reducing emissions;
- Promotes investment in low-GHG technologies and fuels (including energy efficiency);
- Advances the state's broader environmental goals by ensuring that environmental benefits accrue to overburdened communities;
- Offers transition assistance to displaced workers.

Basic Options

Question 2: Broadly speaking, should emission allowances be auctioned or allocated administratively, or some combination?

Response 2: In general, allocations are appropriate for price–regulated entities and those subject to competition from uncapped entities as this minimizes the cost of compliance to end consumers and avoids placing entities competing with non-capped entities at a disadvantage. In the electricity industry, initial allocation on an output (per MWh) basis rewards low emitters, rewards early actions, and maximizes incentives for high emitters to reduce their emissions. Allocations should be made in a manner that ensures that all providers of electricity eventually reach the same level of carbon intensity. Some hybrid designs may have merit if used in a manner designed to ensure absolute reductions (allocation below current emission levels) and provide an appropriate and well-managed revenue stream for technology advancement and related programs. Design should consider impact on overall compliance cost passed on to consumers and policy goals of encouraging early actions and maximizing incentives for high emitters to reduce their emissions as well as the extent to which competition occurs with entities not covered by AB 32. Any program that includes auctions should carefully consider how to ensure that program funds received from consumers are efficiently applied to GHG reduction and technology advancement that benefits the same group of consumers. The mix should be consistent with the goals articulated in our Response to Question 1, *supra*. Any cross-subsidy between groups of consumers should be explicitly identified and considered in designing the system.

Question 3: If you recommend partial auctioning, what proportion should be auctioned? Should the percentage of auctioning change over time? If so, what factors should be used to design the transition toward more auctioning?

Response 3: SDG&E and SoCalGas favor free allocations for the electric sector and capped sources in the gas sector (with programmatic treatment of gas end use for entities with usage below levels subject to CARB reporting requirements) to minimize rate impacts to customers and to ensure that utilities can direct resources to the most effective GHG mitigation strategies. To the extent auctions are used in the utility sector, proceeds should be directed back to LSEs to use for the benefit of consumers through rate relief or cost-effective GHG mitigation and to help defray the costs of required systems enhancements and maintenance. In general, SDG&E and SoCalGas recommend that in any sectors where auctions are used, either well tested approaches or pilots of modest scale be used to reduce the risk of unforeseen adverse consequences. If auctions are used, they should be expanded only based on hard evidence that they are improving the overall cost effectiveness of the AB32 program. In the event auctions are used, oversight mechanisms should be created to ensure that funds are used to benefits consumers not serve as an effective tax used to fund unrelated government programs.

Question 4: How should new market entrants, such as energy service providers, community choice aggregators, or (deliverer/first seller system only) new importers, obtain emission allowances, i.e., through auctioning, administrative allocation, or some combination?

Response 4: New entrants should receive a share of the total allocation to their sectors in proportion to their market share. In general, pre-existing participants should be indifferent in terms of compliance obligation as new participants enter or exit the market.

Auctioning of Emission Allowances—General Questions

Question 5: What are the important policy considerations in the design of an auction?

Response 5: A simple and transparent process with a well-defined quantity being auctioned and clear rules that would minimize gaming and price volatility. The policy considerations outlined in a recent paper from RGGI on the issue included:

- Low administrative costs, low transaction costs for bidders;
- Perceived as fair, transparent, and understandable to participants and the public;
- Economically efficient — that is, getting allowances to those who value them the most;
- Avoiding collusive behavior by bidders and providing good signals about market prices;
- Helping to minimize price volatility;
- Raising reasonable revenues from the sale of a valuable public asset; and
- Compatible with existing electricity and energy markets.

Question 6: How often should emission allowances be auctioned? How does the timing and frequency of auctions relate to the determination of a mandatory compliance period, if at all?

Response 6: If any allowances are to be auctioned, there should be at least one auction for each mandatory compliance period with banking across compliance periods and limited borrowing at the end of the compliance period allowed. The necessity for more frequent auctions depends on the importance of several factors including whether there is a developed secondary market. More frequent auctions provide regular liquidity to the market and reduce the demands on firms' credit if the secondary market is not fully functional. On the other hand, smaller more frequent auctions are administratively more time-consuming, may be more likely to be subject to manipulation than larger, less frequent ones, and may lead to less market certainty and greater price volatility.

Question 7: How should market power concerns be addressed in auction design? If emission allowances are auctioned, how would the administrators of such a program ensure that all market participants are participating in the program and acting in good faith?

Response 7: The auction method should not be used if the market is so small that firms can manipulate the GHG market price. The market should contain as many sectors as possible and be regionally developed, if possible, to eliminate these concerns.

Question 8: What criteria should be used to designate the types of expenditures that could be made with auction revenues (including use to reduce end user rates), and the distribution of money within those categories?

Response 8: All auction revenues should be used to minimize the overall cost of achieving climate change objectives in a way that equitably apportions those costs and targets funding to the most cost effective measures. Funds should be directed on a proportional basis to the electric and gas utility sectors to mitigate rate impacts, fund acquisition of low or zero-carbon resources, increase energy efficiency and fund technology advancement (all under the supervision of the CPUC). Suggesting a specific mix would require more cost-benefit analysis than is currently available. However, the capped entities themselves are in the best position to make the trade-offs and should play a primary role in determining the use of proceeds.

Question 9: What type of administrative structure should be used for the auction? Should the auction be run by the State or some other independent entity, such as the nonprofit organization being established by the Regional Greenhouse Gas Initiative?

Response 9: SDG&E and SoCalGas support allocation in their sectors over auctions. In sectors where auctions are used, who runs the auction, provided that they are not a market participant, is less important than getting the process and rules right and determining the flow of revenues raised through the auction as discussed above.

Electricity Sector

Administrative Allocation of Emission Allowances

Question 10: If some or all allowances are allocated administratively, which of the above method or methods should be used for the initial allocations? If you prefer an option other than one of those listed above, describe your preferred method in detail. In addition to your recommendation, comment on the pros and cons of each method listed above, especially regarding the impact on market performance, prices, costs to customers, distributional consequences, and effect on new entrants.

Response 10: Initial allocation to LSEs should ideally be made on an output of electricity basis (total MWh consumed). Every MWh of consumption should receive the same allowances, without regard to fuel input, historical emissions, or current day emissions of the power consumed. This approach to allocation would maximize incentives to reduce emissions for high emitters, reward low emitters, and reward/avoid punishing early actions.

Question 11: Should the method for allocating emission allowances remain consistent from one year to the next, or should it change as the program is implemented?

Response 11: Yes, the method for allocating emission allowances should remain consistent from one year to the next.

Question 12: If new market entrants receive emission allowance allocations, how would the proper level of allocations be determined for them?

Response 12: This depends on whether the point of regulation is LSEs or First Sellers. For an LSE, or load-based regime, the GHG emission allowance allocation should be assigned to the new market entrants (retail providers) based on the consumption (MWh of load) represented by that customer – matching the preferred method for allocation emission allowances. For a First Seller based regime, allocations would be made to LSEs based on their output allocation (MWhs of the LSE's customers' consumption), and sold by them to the First Seller that serves this demand. In general, pre-existing participants should be indifferent in terms of compliance obligation as new participants enter or exit the market, customers migrate to and from LSEs, or customers elect to self generate.

Question 13: If emission allowances are allocated based on load/sales, population, or other factors that change over time, how often should the allowance allocations be updated?

Response 13: Under a load-based regime, emission allowances should be updated monthly for the migration of customers among retail providers, and annually for the declining cap and electrification in other sectors. A multi-year compliance cycle would smooth out allowance prices related to other factors such as hot weather, extreme events such as the recent firestorm in southern California, and population changes.

Question 14: If emission allowances are allocated based on historical emissions ("grandfathering") or benchmarking, what base year(s) should be used as the basis for those allocations?

Response 14: First the criteria should be determined and then years that meet the criteria should be found. With an earlier year selected, the allocation methodology will be less likely to punish early actions; the later the year selected, the greater the likelihood that the allocation methodology will punish early actions. For the electric sector, the year or years selected should be ones with near average temperature and hydro conditions.

Question 15: If emission allowances are allocated based initially on historical emissions ("grandfathering"), should the importance of historical emissions in the calculation of allowances be reduced in subsequent years as providers respond to the need to reduce GHGs? If so, how should this be accomplished? By 2020, should all allocations be independent of pre-2012 historical emissions?

Response 15: Allocations should not be based on historical GHG emissions for any year. So in answer to the question - all allocations should be independent of pre-2012 historical emissions by 2020.

Question 16: Should a two-track system be created, with different emission allowances for deliverers/first sellers or retail providers with legacy coal-fueled power plants or legacy coal contracts? What are the factors and trade-offs in making this decision? How would the two tracks be determined, e.g., using an historical system emissions factor as the cut-off? How should the allocations differ between the tracks, both initially and over time? What would be the market impact and cost consequences to consumers if a two-track method were used?

Response 16: No. While the Commission must consider the boundaries of the California GHG market, applying a two-track system with different standards will cause the allocation measures to be facially suspect under the U.S. Constitution. When a statute is viewed as facially discriminate, the reviewing court must subject it to stricter scrutiny. For example, if a statute requires that certain activities must occur within a state, reviewing courts will deem it "virtually per se illegal."[8] Instead of focusing on the subject matter of the regulation or the manner in which the statute impacted commerce,

[8] *Pike v. Bruce Church, Inc., 397 U.S. 137, 145 (1970).*

the Supreme Court's post-Pike inquiry focuses on whether a statute discriminated and what local benefits might offset such discrimination.

Currently LSEs with legacy coal contracts or coal plants are generally reaping positive benefits of lower electricity prices, or for coal generators, economic rents. Correspondingly, it is unclear how implementing different emission allowances for deliverers/first sellers or retail providers with legacy coal-fueled power plants or legacy coal contracts could not facially discriminate against customers of retail providers with a lower carbon footprint and higher rates, no matter the intentions, by what will invariably work to subsidize customers of retail providers with significantly lower rates but large carbon footprints.

Question 17: If emission allowances are allocated administratively to retail providers, should other adjustments be made to reflect a retail provider's unique circumstances? Comment on the following examples, and add others as appropriate:

a. Climate zone weighting to account for higher energy use by customers in inclement climates
b. Increased emission allowances if there is a greater-than-average proportion of economically disadvantaged customers in a retail provider's area.

Response 17a: If initial allocations are done on an output (per MWh) basis, then energy use variations due to climate are accounted for on an average year basis.

Response 17b: A greater-than-average proportion of economically disadvantaged customers in a retail provider's area should have no affect on allocations. If greater allocations were made to retail providers with a greater-than-average proportion of economically disadvantaged customers, there could be less reduction of GHG and associated pollution in the economically disadvantaged areas, contrary to one of the stated goals.

Question 18: Should differing levels of regulatory mandates among retail providers (e.g., for renewable portfolio standards, energy efficiency investment, etc.) be taken into account in determining entity-specific emission allowance allocations going forward? For example, should emission allowance allocations be adjusted for retail providers with high historical investments in energy efficiency or renewables due to regulatory mandates? If those differential mandates persist in the future, should they continue to affect emission allowance allocations?

Response 18: No, no adjustment need be made. An allocation of GHG emission allowances on an output basis (per MWh) should be the basis for the initial allocation. While this does disadvantage those who undertook energy efficiency investments in the 1990s, the retail providers that undertook such actions are also those with the lowest GHG emissions per MWh.

Question 19: How often should the allowance allocation process occur? How far in advance of the compliance period?

Response 19: As with auctions, there should be at least one allocation for each mandatory compliance period with banking across compliance periods and limited borrowing at the end of the compliance period allowed. Unlike auctions, more frequent allocations are not necessary to limit the demands on firms' credit and manipulation in the primary allowance market is not an issue (issues could arise in secondary markets if they are not sufficiently broad and liquid).

Question 20: What are the distributional consequences of your recommended emission allowance allocation approach? For example, how would your method affect customers of retail providers with widely differing average emission rates? Or differing rates of population growth?

Response 20: An output of electricity based initial allocation of GHG emissions allowances to LSEs with declining cap over time would have the same distributional consequences as an auction approach in the electric sector. Under this approach, the costs of compliance would be higher for retail providers with a larger carbon footprint.

Early actions that have had the effect of reducing emissions would be rewarded. This approach would disadvantage retail providers with high growth since the GHG per MWh would have to decline at a faster rate. On the other hand, retail providers with growing areas have more chance to reduce GHG emissions in new construction efficiency and in arranging for new low-GHG long-term supplies.

Emission Allowances with a Deliverer/First Seller Point of Regulation

Question 21: Would a deliverer/first seller point of regulation necessitate auctioning of emission allowances to the deliverers/first sellers?

Response 21: Yes, for all but generators with long-term contracts that do not allow for passing on GHG emission allowance costs. To avoid imposing windfall losses on generators with long-term contracts, they should receive a direct allocation of allowances from the LSE with the contract based on MWh produced to avoid unanticipated economic harm.

Question 22: Are there interstate commerce concerns if auction proceeds are obtained from all deliverers/first sellers and spent solely for the benefit of California ratepayers? If there are legal considerations, include a detailed analysis and appropriate legal citations.

Response 22: Yes, a regulatory scheme of this type would most likely face challenges based on the Interstate Commerce Clause of the U.S. Constitution, because generators outside of California wishing to sell into the region at lower prices can be expected to contest the regulation as a violation of the dormant Commerce Clause, which prohibits any state from enacting regulations that discriminate against (or place burdens on) interstate commerce.[9] However, the U.S. Supreme Court has recognized a very narrow

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[9] *See* U.S. CONST. art. I, § 8, cl. 3; Or. *Waste Sys., Inc. v. Dep't of Envtl. Quality, 511 U.S. 93, 99 (1994)* (holding that state laws placing burdens on interstate commerce are subject to challenge based on the Commerce Clause of the U.S. Constitution); Robert B. McKinstry, Jr., *Laboratories for Local Solutions for Global Problems: State, Local and Private Leadership in Developing Strategies to Mitigate the Causes*

exception to the per se rule of invalidity for facially discriminatory regulations, in the form of the compensatory tax doctrine.[10] Under the rare and infrequently asserted compensatory tax doctrine, a facially discriminatory regulation may survive an interstate commerce scrutiny if it is a narrowly defined compensatory tax designed solely to make interstate commerce bear a burden already borne by intrastate commerce.[11] Although often expressed as an independent doctrine unto itself, the compensatory tax doctrine is more accurately a specific way of justifying a facially discriminatory tax because it achieves a legitimate local purpose that cannot be achieved through nondiscriminatory means.[12]

The Supreme Court laid the groundwork for the compensatory tax doctrine in the 1868 case of *Hinson v. Lott*.[13] In *Hinson*, the state of Alabama imposed a tax on all liquor imported into the state equal to the tax imposed on all liquor distilled within the state.[14] The Supreme Court found that the tax on imported liquor was merely a complementary provision necessary to make the tax equal on all liquors sold in the state.[15] Therefore, the Court held that this was not an attempt to regulate commerce, but an appropriate and legitimate exercise of the state's taxing power.[16]

Since *Hinson*, the Supreme Court has more clearly defined and significantly limited the compensatory tax doctrine through a line of cases beginning in 1937 with

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and Effects of Climate Change, 12 PENN ST. ENVTL. L. REV. 15, 67 (2004) (noting potential Commerce Clause challenges to state and regional regulatory programs).

10/ *See Fulton Corp. v. Faulkner, 516 U.S. 325, 331 (1996)* (quoting *Lohman, 511 U.S. at 647).*

11/ *See Or. Waste, 511 U.S. at 102.*

12/ *See Or. Waste, 511 U.S. at 102.*

13/ *See 75 U.S. 148, 153 (1868)*.

14/ *Id. at 150.*

15/ *Id. at 153.*

16/ *Id.*

Henneford v. Silas Mason and culminating in the decision of *Fulton Corp. v. Faulkner* in 1996.[17] Modern application of the compensatory tax doctrine involves a three-part test set out in 1994 in *Oregon Waste Systems v. Department of Environmental Quality of the State of Oregon* and refined in *Fulton Corp.*[18] The three conditions necessary for a valid compensatory tax are: (1) a state must identify the intrastate burden for which the state is attempting to compensate; (2) the tax on interstate commerce must be shown roughly to approximate - but not to exceed - the amount of the tax on intrastate commerce; and (3) the events on which the interstate and intrastate taxes are imposed must be substantially equivalent - that is, they must be substantially similar in substance to serve as mutually exclusive proxies for each other.[19] Given the relatively short life and limited application of the formalized three-part test, it is necessary that the Commission closely examine earlier cases, which address each of the prongs only implicitly, to analyze the compensatory tax doctrine fully before implementing an emission allowances auction to obtained proceeds from all deliverers/first sellers which are then spent solely for the benefit of California ratepayers.[20] It is imperative to fully understand the economic efficiency of different policy models – including upstream and downstream cap-and-trade programs and tax systems.

Question 23: If you believe 100% auctioning to deliverers/first sellers is not required, explain how emission allowances would be allocated to deliverers/first sellers. In doing so, answer the following:

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[17] *See Fulton, 516 U.S. at 332. See generally Henneford v. Silas Mason Co., 300 U.S. 577 (1937).*

[18] *See Fulton, 516 U.S. at 332-33; Or. Waste, 511 U.S. at 103.*

[19] *See Fulton, 516 U.S. at 332-33.*

[20] *See* Kirsten H. Engel, *The Dormant Commerce Clause Threat to Market-Based Environmental Regulation: The Case of Electricity Deregulation, 26 ECOLOGY L.Q. 243, 250-52 (1999)* (noting the Commerce Clause objections to market-based environmental regulation and arguing that such regulation should be upheld because it promotes economic efficiency and interstate harmony, and is not motivated by economic protectionism)..

a. How would the amount of emission allowances given to deliverers/first sellers be determined during any particular compliance period?

b. How would importers that are marketers be treated, e.g., would they receive emission allowance allocations or be required to purchase all their needed emission allowances through auctions? If allocated, using what method?

c. How would electric service providers be treated?

d. How would new deliverers/first sellers obtain emission allowances?

e. Would zero-carbon generators receive emission allowance allocations?

f. What would be the impact on market performance, prices, and costs to customers of allocating emission allowances to deliverers/first sellers?

g. What would be the likelihood of windfall profits if some or all emission allowances are allocated to deliverers/first sellers?

h. How could such a system prevent windfall profits?

Response 23: Not applicable.

Question 24: With a deliverer/first seller point of regulation, should administrative allocations of emission allowances be made to retail providers for subsequent auctioning to deliverers/first sellers? If so, using what allocation method? Refer to your answers in Section 3.4.1., as appropriate.

Response 24: Yes, on an output of electricity (per MWh) basis. In that way, the proceeds of the auction flow directly to retail providers for GHG reduction activities and/or rate moderation. All auction revenues should be used to minimize the overall cost of achieving climate change objectives in a way that equitably apportions those costs. Funds in the electric sector should be directed to retail providers to mitigate rate impacts, fund acquisition of low or zero-carbon resources, increase energy efficiency and fund technology advancement (all under the supervision of the CPUC). The issue of allocation to retail providers is no different than in Section 3.4.1.

Question 25: If you recommend allocation of emission allowances to retail providers followed by an auction to deliverers/first sellers, how would such an auction be administered? What kinds of issues would such a system raise? What would be the impact on market performance, prices, and costs to customers?

Response 25: In general, the auction would be no different than if the government or other entity, not a market participant, ran the auction.

Natural Gas Sector

Question 26: Answer each of the questions in Section 3.4.1. except Q16, but for the natural gas sector and with reference to natural gas distribution companies (investor- or publicly-owned), interstate pipeline companies, or natural gas storage companies as appropriate. Explain if your answer differs among these types of natural gas entities. Explain any differences between your answers for the electricity sector and the natural gas sector.

Question 10Gas: If some or all allowances are allocated administratively, which of the above method or methods should be used for the initial allocations?

Response 10Gas: SDG&E and SoCalGas do not believe these natural gas sectors (natural gas distribution companies, interstate pipeline companies, or natural gas storage companies) are best regulated via cap and trade (except for combustion as large point sources that fall under the CARB reporting standards). For a cap and trade system, the quantity of emissions must be well known. For upstream interstate pipelines, distribution companies, and storage facilities, emissions into the atmosphere from other than combustion are very small relatively speaking and uncertain. Thus those emissions are best controlled via programmatic approaches and standards.

Further, the point of regulation should be attached to the physical commodity. Interstate pipelines and storage companies do not generally own the natural gas they transport. Natural gas distribution companies do not own the natural gas they transport for noncore customers. The roles of shippers and marketers are separate from the role of pipeline and storage operators. Attempts to distribute GHG emission allowances among pipeline and storage operators could prove unduly burdensome and could create FERC jurisdiction issues.

For natural gas distribution companies, the actual combustion process and the non-combustion use of natural gas (and associated GHG emissions) are outside the control of the distribution company (except for its own large point sources such as compressor stations) and the GHG content of the fuel is not alterable. The only control of customer usage by the utility is via energy efficiency programs. A much larger influence on GHG reductions can be made in this sector via controls established by the State, through state appliance and building standards, and by the customer, through choice of the type of equipment (gas or electric, level of efficiency) and operation and maintenance of the equipment. Making the natural gas distribution companies part of a cap-and-trade system will provide price signals to gas customers, but in the last several years, energy usage by customers use has been shown to be highly price inelastic. A programmatic approach through distribution companies' energy efficiency programs and appliance and building standards is preferred by SoCalGas and SDG&E for this sector.

Question 11Gas: Should the method for allocating emission allowances remain consistent from one year to the next, or should it change as the program is implemented?

Response 11Gas: SDG&E and SoCalGas do not believe these sectors are best regulated via cap and trade.

Question 12Gas: If new market entrants receive emission allowance allocations, how would the proper level of allocations be determined for them?

Response 12Gas: SDG&E and SoCalGas do not believe these sectors are best regulated via cap and trade. If nevertheless subject to cap and trade, for natural gas distribution companies (investor- or publicly-owned) or for interstate pipeline companies directly serving customers, it would be based on the load that migrated to them from existing retail providers.

Question 13Gas: If emission allowances are allocated based on load/sales, population, or other factors that change over time, how often should the allowance allocations be updated?

Response 13Gas: SDG&E and SoCalGas do not believe these sectors are best regulated via cap and trade. If nevertheless subject to cap and trade, emission allowances should be updated annually for the migration of customers among retail providers and for the declining cap. A multi-year compliance cycle would smooth out allowance prices related to other factors such as cold weather and population changes.

Question 14Gas: If emission allowances are allocated based on historical emissions ("grandfathering") or benchmarking, what base year(s) should be used as the basis for those allocations?

Response 14Gas: SDG&E and SoCalGas do not believe these sectors are best regulated via cap and trade. If nevertheless subject to cap and trade, first, the criteria should be determined and then years that meet the criteria should be found. For the gas sector, years that average near the 20 year average temperature should be used. 2004, 2005 and 2006 might be appropriate candidate years to use for allocation.

Question 15Gas: If emission allowances are allocated based initially on historical emissions ("grandfathering"), should the importance of historical emissions in the calculation of allowances be reduced in subsequent years as providers respond to the need to reduce GHGs? If so, how should this be accomplished? By 2020, should all allocations be independent of pre-2012 historical emissions?

Response 15Gas: As stated above, there is no difference in using historical emissions or output; they are proportional for natural gas.

Question 17Gas: If emission allowances are allocated administratively to retail providers, should other adjustments be made to reflect a retail provider's unique circumstances? Comment on the following examples, and add others as appropriate:

a. Climate zone weighting to account for higher energy use by customers in inclement climates; and

b. Increased emission allowances if there is a greater-than-average proportion of economically disadvantaged customers in a retail provider's area.

Response 17Gas a: If initial allocations are done on an output (per therm) basis, then energy use variations due to climate under average year conditions are accounted for.

Response 17Gas b: A greater-than-average proportion of economically disadvantaged customers in a retail provider's area should have no affect on allocations. If greater allocations were made in this fashion, there would be less reduction of GHG and associated pollution in the economically disadvantaged areas, contrary to one of the stated goals.

Question 18Gas: Should differing levels of regulatory mandates among retail providers (e.g., for renewable portfolio standards, energy efficiency investment, etc.) be taken into account in determining entity-specific emission allowance allocations going forward? For example, should emission allowance allocations be adjusted for retail providers with high historical investments in energy efficiency or renewables due to regulatory mandates? If those differential mandates persist in the future, should they continue to affect emission allowance allocations?

Response 18Gas: SDG&E and SoCalGas do not believe these sectors are best regulated via cap and trade.

Question 19Gas: How often should the allowance allocation process occur? How far in advance of the compliance period?

Response 19Gas: SDG&E and SoCalGas do not believe these sectors are best regulated via cap and trade. If there were a cap-and-trade program for this sector, there should be at least one allocation for each mandatory compliance period with the compliance period being at least three years to accommodate variable weather. Banking across compliance periods and limited borrowing at the end of the compliance period should be allowed.

Question 20Gas: What are the distributional consequences of your recommended emission allowance allocation approach? For example, how would your method affect customers of retail providers with widely differing average emission rates? Or differing rates of population growth?

Response 20Gas: SDG&E and SoCalGas do not believe these sectors are best regulated via cap and trade. An initial output (per therm) allocation with declining cap would have the same distributional consequences as an auction approach. Under this approach, the costs of compliance would be higher for facilities with larger emissions. This approach would disadvantage retail providers with high population growth. The high growth utility would have to spend more for energy efficiency reductions to offset the growth and/or purchase more allowances.

Question 27: Are there any other factors unique to the natural gas sector that have not been captured in the questions above? If so, describe the issues and your recommendations.

Response 27: SDG&E and SoCalGas do not believe these sectors are best regulated via cap and trade. For a cap and trade system, the quantity of emissions must be well known. For upstream pipelines, distribution companies, and storage facilities, fugitive emissions and lost and unaccounted for volumes are estimated and are best controlled via programmatic approaches and standards. Further, natural gas combustion in utility operations accounted for only 0.14% of the State's 2004 total estimated CO2e GHG emissions.[21] Of the SoCalGas and SDG&E facilities, 80% of the emissions occurred at facilities that are likely to be subject of ARB's large facility point source rules. Extrapolating to the sector's statewide figure, gas operations sector not directly regulated by CARB as large sources may only represent 0.03% of Statewide CO2e emissions. Also see Response 10gas *supra.*

<u>Overall Recommendation</u>

Question 28: Considering your responses above, summarize your primary recommendation for how the State should design a system whereby electricity and natural gas entities obtain emission allowances if a cap and trade system is adopted.

Response 28: SDG&E and SoCalGas support an administrative initial allocation of GHG allowances to regulated electric load serving entities on an output of electricity (per MWh) basis with the allocation declining over time in proportion with the overall state cap. Natural gas should be regulated at the point of combustion. For facilities with limited use of natural gas, falling below the CARB reporting standards, regulation should be through efficiency standards and other activities imposed on the actual source of emissions rather than through a cap and trade program. The standards and allocations

[21] Attachment A, page 7 of the ALJ's Ruling Regarding Comments on Staff Natural Gas Proposal, dated July 12, 2007.

should decline over time in such a way that the electricity and natural gas sectors contribute a proportionate share of the state's GHG reduction goals. Cross-sectoral trading markets should be established to allow electric and natural gas entities, as well as participants from other sectors, to trade allowances to help ensure that mitigation mechanisms are undertaken in order of lowest marginal cost across sectors. Furthermore, trading should be allowed to substitute for reductions otherwise mandated through programmatic standards, provided that appropriate verification systems are in place. If auctions are used, they should be designed to ensure that proceeds benefit customers by being used for cost effective contributions to climate change mitigation. They should be directed to off-set price impacts to price-regulated entities and their customers and entities subject to competition from uncapped entities.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **RESPONSE OF SAN DIEGO GAS & ELECTRIC COMPANY (U902E) AND SOUTHERN CALIFORNIA GAS COMPANY (U904G) ON ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING COMMENTS AND NOTICING WORKSHOP ON ALLOWANCE ALLOCATION ISSUES** on each party named in the official service list for proceeding **R.06-04-009** by electronic service, and by U.S. Mail to those parties who have not provided an electronic address.

Copies were also sent via Federal Express to Commissioner Michael R. Peevey, and assigned Administrative Law Judges Charlotte TerKeurst, Jonathan Lakritz, and Meg Gottstein.

Executed this 31st day of October 2007 at San Diego, California.

/s/ Susan A. Long
Susan A. Long

CALIFORNIA PUBLIC UTILITIES COMMISSION
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Proceeding: R0604009 - CPUC - PG&E, SDG&E,
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