

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Order Instituting Rulemaking to Implement
the Commission's Procurement Incentive
Framework and to Examine the Integration
of Greenhouse Gas Emissions Standards into
Procurement Policies.

R.06-04-009

**PRE-WORKSHOP COMMENTS OF DYNEGY ON
ALLOWANCE ALLOCATION ISSUES**

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I. Introduction and Summary

Pursuant to the October 15, 2007 *Assigned Commissioner's Ruling: Requesting Comments and Noticing Workshop on Allowance Allocation Issues*,¹ Dynegy Morro Bay LLC, Dynegy Moss Landing LLC, and Dynegy South Bay LLC ("Dynegy") hereby present its comments on greenhouse gas ("GHG") allowance allocation issues in the above referenced docket and in the California Energy Commission's Docket No. 07-OIIP-01.

Dynegy supports the creation of a national GHG emissions reduction program that permits the development of economic and reliable power while simultaneously protecting the nation's energy security and economic stability with a diverse portfolio of fuel options. Regulation of GHG emissions is best achieved at the national level through an economy-wide carbon tax or a cap and trade program that incorporates as many sectors of the economy as practical.

¹ Posted at <http://www.cpuc.ca.gov/EFILE/RULINGS/73857.htm>

Although a national program is the best approach to regulate GHG emissions, we understand California is moving ahead to establish its own GHG emission reduction program prior to the adoption of such a program by the federal government. Because California deems it in its best interest to develop its own policy, Dynegy will offer comments on proposals that are currently before California regulators. These comments do not change our position that a national GHG emission reduction program is the preferred alternative.

II. Comments

3.1. Evaluation Criteria

Q1. Please comment on each of the criteria listed by the MAC. Are these criteria consistent with AB 32? Should other criteria be added, such as criteria specific to the electricity and/or natural gas sectors? In making trade-offs among the criteria, which criteria should receive the most weight and which the least weight?

Dynegy supports the creation of a cap and trade program.² A carefully crafted trading program will encourage GHG emission reductions and innovation at a lower price than traditional command and control tools. A GHG program should also include all major sources of GHG emissions, not just one sector and not just major stationary sources in one or a limited number of sectors. Instead, all sectors and all sources large enough to justify regulation that have GHG emissions should be included in GHG regulation. It is also important to treat all similarly situated market participants in a non-discriminatory manner. Leakage, as defined by the MAC, must also be addressed to prevent in-state generation from being placed at a competitive disadvantage to out-of-state resources.

² A flexible environmental regulation mechanism that sets an overall limit on the emission of a certain pollutant, but allows companies that can easily reduce emissions to sell credits to other companies for which such reduction would be difficult. The cap ensures that emissions will not exceed a desired amount.

3.2. Basic Options

These questions should be answered for both the electricity and natural gas sectors. If your recommendations differ for a load-based or deliverer/first seller point of regulation in the electricity sector, or for the natural gas sector, explain why.

Dynegy's responses are for the electricity sector only.

Q2. Broadly speaking, should emission allowances be auctioned or allocated administratively, or some combination?

If a first seller or source-based program is adopted, existing sources should receive some, if not all, of their allocations based on historic emissions performance, since that historic performance has been, by definition, in compliance with all then-existing regulatory requirements. Such an allocation system will, in part, recognize the reliability benefits conferred by such sources, provide funding for emission reductions investments, and offset some of the loss of market value of these resources.

If a load-based system is adopted, Dynegy welcomes suggestions on how to allocate allowances; however, Dynegy unequivocally opposes a system that proposes no cost or other preferential allocations to LSEs while independent power producers (IPPs) would be required to purchase allocations from the LSE or other marketers. Such an LSE no cost or preferential allocation scheme clearly is discriminatory, given California's hybrid procurement system wherein LSE also own generating resources. This disparate approach would give LSE-owned generation a distinct competitive advantage over IPP-owned generation with no associated GHG reduction benefits.

Dynegy also opposes a policy that would allot free allowances to LSEs who would, in turn, auction them off to IPPs. LSEs could leverage that position by tying such purchase to an LSE supply agreement and thus reap an unfair advantage over

independent power producers in the general market and at the bargaining table. Two clear principles emerge.

First, any market structure must treat all similarly situated market participants in a non-discriminatory manner.

Second, requiring IPPs to purchase allowances from an LSE is not only anti-competitive but provides no GHG emission reduction benefits.

Q3. 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?

Dynegy recommends that allowances initially be allocated to the sources that are regulated based on historic emissions performance. Over time, the distribution method should transition toward auctioning, once a deep and liquid allocation trading market has developed.

Q4. 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?

A new entrant set-aside should be created, under either a load-based or first seller system. Moreover, a GHG regulatory system that is multi-sector (as opposed to focused solely on the electric sector) offers the best means for new market entry and, not surprisingly, the greatest potential for overall reduction of GHG by bringing all sources of GHG into the market created.

3.3. *Auctioning of Emission Allowances—General Questions*

These questions assume that some or all emission allowances are auctioned, and should be answered for both the electricity and natural gas sectors. If your recommendations differ for a load-based or deliverer/first seller point

of regulation in the electricity sector, or for the natural gas sector, explain why.

Q5. What are the important policy considerations in the design of an auction?

If California decides to hold auctions for allowances, it should plan for and prevent auction participants from creating artificial scarcity by buying and retiring allowances. Initially, participation in the auction should be limited to entities in the regulated sectors to prevent speculators from profiting by trying to gain market power in tradeable allowances. Proceeds from these auctions could be used to promote research and development of emission reduction technology.

Q6. 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?

Dynegy does not have an opinion on this question at this time.

Q7. 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?

See answer to Q5

Q8. 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?

Auction revenues could be dedicated to the development of technology to reduce GHG emissions. In general, any expenditures should help create more allowances to help develop a deeper and more liquid market for allocations.

Q9. 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?

An auction should be administered by a non-governmental entity, neutral third party without a profit motive or any other interest in the allocation market.

3.4. Electricity Sector

3.4.1. Administrative Allocation of Emission Allowances

Various methods have been proposed and discussed for the administrative allocation of emission allowances. The following potential methods could be used:

- a. **Grandfathering**: “A method by which emission allowances are freely distributed to entities covered under an emissions trading program based on historic emissions.” (MAC report, p. 93.)
- b. **Benchmarking**: “An allowance allocation method in which allowances are distributed by setting a level of permitted emissions per unit of input or output” (e.g., fuel used or sales to customers (pounds (lbs)/megawatt-hour or lbs/million British thermal units (MMBtu)). (MAC report, p. 90.)
- c. **Updating**: “A form of allowance allocation in which allocations are reviewed and changed over time and/or awarded on the basis of changing circumstances (such as output) rather than historical data (such as emissions, input or output). For example, allowances might be distributed based on megawatt-hours generated or tons of a product manufactured.” (MAC report, p. 96.)
- d. **Other**: Such as population (lbs of carbon dioxide (CO₂)/customer or lbs CO₂/capita), or cost of compliance (based on retail provider supply curves of emission reduction measures, or a comparable metric).

Answer each of the questions in this section, first, for a load-based system in the electricity sector and, second, for a deliverer/first seller system in the electricity sector. If your recommendations differ for a load-based or deliverer/first seller point of regulation, explain why.

- Q10.** 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.

Allocations should be based on historic emissions performance. This method of allocation would recognize the reliability benefits provided by existing sources, provide funding for emission reductions investments, and offset some of the loss of market value of these resources.

Q11. Should the method for allocating emission allowances remain consistent from one year to the next, or should it change as the program is implemented?

Any GHG emission allocation system must provide certainty for market participants. Entities have made and will make substantial investments in pursuit of their individual GHG compliance strategies. The method for administratively allocating allowances should remain consistent over time.

Q12. If new market entrants receive emission allowance allocations, how would the proper level of allocations be determined for them?

New market entrants should be allocated allowances from a set-aside pool.

Q13. 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?

Dynegy does not have a position on this question at this time.

Q14. 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?

The baseline should be the average of the last 5 years. This will account for variations in the operation of generation due to fluctuations in electrical demand, equipment maintenance and repair, and generation levels influenced by hydro conditions.

Q15. 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?

The importance of historical emissions performance should not be minimized with the passage of time. Beyond 2012, electricity demand will likely continue to grow in California and it will be extremely challenging to have sufficient new zero-emitting technology on-line in time to meet the 2020 cap target and meet additional electricity demand. The role of existing fossil resources beyond 2012 should not be understated.

Q16. 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?

Dynegy opposes any system that treats any fuel type in a discriminatory manner.

The system should focus on GHG emissions alone.

Q17. 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.**

Dynegy does not have a position on this question at this time.

Q18. 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?

Retail providers would not be the point of regulation under a first seller system and therefore should not be allocated allowances under a first seller program.

Q19. How often should the allowance allocation process occur? How far in advance of the compliance period?

Dynegy does not have a position on this question at this time.

Q20. 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?

Dynegy does not have a position on this question at this time.

3.4.2. Emission Allowances with a Deliverer/First Seller Point of Regulation

Q21. Would a deliverer/first seller point of regulation necessitate auctioning of emission allowances to the deliverers/first sellers?

No.

Q22. 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.

Dynegy has no comment on this question at this time.

Q23. 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:

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

For in-state resources, allowances could be allocated to all regulated sources based on historic emissions performance. For imported power, allowances could be

allocated to existing contracts and out-of-state resources based on the contract terms or ownership share of the resource.

- 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?**

See answer to Q23a.

- c. How would electric service providers be treated?**

See answer to Q23a.

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

For new in-state resources and importers of power, allowances could be allocated from the new entrant set-aside pool or obtained in the secondary market.

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

Zero carbon generators should not be included in the allocation of emission allowances. Currently, California has programs in place to encourage the development of renewable technology and is considering the creation of a tradable renewable energy credit (TREC). In addition, AB 32 will incentivize LSEs to purchase more renewable projects to reduce their GHG profile. Finally, under a first seller approach, the marginal price of power will rise corresponding to the price of allowances. Zero emitting generators will see an increase in profits corresponding to these price increases, with no increased costs. An additional windfall in the form of allocated allowances is not needed. If any allowances are allocated, they should go to the entities that are regulated under the GHG program.

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

Dynegy has no comment on this question at this time.

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

If allowances are allocated on a historic emission performance basis, they will go to sources that are facing the greatest compliance costs for GHG reductions. This allocation system will recognize the reliability benefits conferred by such sources, provide funding for emissions reductions investments, and offset some of the loss of market value of these resources.

h. How could such a system prevent windfall profits?

A gradual transition to an auction would reduce the potential for windfall profits as would a load-based approach to GHG regulation.

Q24. 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.

The allocation of allowances is influenced by the point of regulation. As previously stated, Dynegy opposes a system that allocates no cost or other preferential allowances to LSEs and requires independent power producers to purchase such allocations

Q25. 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?

See answer to Q2

3.5. *Natural Gas Sector*

Dynegy does not have comments on this section at this time.

- Q26. 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.**
- Q27. 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.**

3.6. *Overall Recommendation*

- Q28. 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.**

Dynegy supports the creation of a national GHG emission reduction program.

However, within the context of California's GHG emission reduction efforts, we support the creation of a cap and trade market that includes as many sources of GHG as possible.

Our preference would be for a load-based system to be adopted because of the competitive issues associated with our hybrid electric market and concerns about leakage.

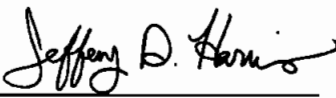
If a first-seller system is implemented, we support the allocation of allowances to regulated sources based on historic emissions performance.

III. Conclusion

Dynegy supports the creation of a national GHG emission reduction program as the preferred outcome. Dynegy appreciates the opportunity to offer comments on these important issues.

Dated: October 31, 2007

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the “*Pre-Workshop Comments of Dynegy On Allowance Allocation Issues*,” 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 as required in this Rulemaking. I have also served this same document on the California Energy Commission in Docket No. 07-OIIP-01 as directed in the October 15, 2007 California Public Utilities Commission Ruling in R.06-04-009. Those parties without email addresses or from which I received a delivery failed message were served by first-class mail with postage prepaid.

Executed on October 31, 2007 at Sacramento, California.

/s/

Deric Wittenborn

R.06-04-009

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