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October 31, 2007

Jeanne B. Armstrong

**VIA E-MAIL & OVERNIGHT DELIVERY**

California Energy Commission  
Docket Unit, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5504

<b>DOCKET</b>	
<b>07-OIIP-1</b>	
<b>DATE</b>	OCT 31 2007
<b>RECD.</b>	OCT 31 2007

**Re: Docket No. 07-OIIP-1, Rulemaking 06-04-009, Comments of Wild Goose Storage**

Dear Sir or Madam:

Attached please find an original copy of the Wild Goose Storage's Comments on Administrative Law Judges' Ruling Requesting Comments and Legal Briefs on Allowance Allocation Issues to be filed in the above-referenced docket. Simultaneously with this mailing, an electronic copy of the referenced response was e-mailed to the Energy Commission's Docket Unit and the person listed below.

Should you have any question with regard to the referenced filing, please contact the undersigned.

Very truly yours,

GOODIN, MACBRIDE,  
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By

*Jeanne B. Armstrong*  
Jeanne B. Armstrong

Enclosures

cc: Karen Griffin (kgriffin@energy.state.ca.us)

3278/005/X93879.v1

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

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

Rulemaking 06-04-009  
(Filed April 13, 2006)

and

*CEC Docket 07-OIIP-01*

**COMMENTS OF  
WILD GOOSE STORAGE, LLC  
ON ALLOWANCE ALLOCATION ISSUES**

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Date: October 31 , 2007

Attorneys for Wild Goose Storage, LLC

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

Order Instituting Rulemaking to Implement the  
Commission's Procurement Incentive Framework and to  
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and

*CEC Docket 07-OIIP-01*

**COMMENTS OF  
WILD GOOSE STORAGE, LLC  
ON ALLOWANCE ALLOCATION ISSUES**

In accord with the October 15, 2007 Administrative Law Judge's Ruling in the above captioned proceeding ("October 15 Ruling"), Wild Goose Storage, LLC ("Wild Goose"), hereby submits these comments on issues related to the distribution of greenhouse gas ("GHG") emission allowances.

**I. POLICY CONSIDERATIONS**

The October 15 Ruling opines that, "developing evaluation criteria may help the [California Public Utilities and the California Energy] Commissions analyze the issues surrounding emission allowance allocation issues." To this end, the Ruling sets forth eight principals which are recommended by the Market Advisory Committee guidelines for allocating allowances, and questions parties as to the efficacy of these criteria and whether additional criteria should be added. Wild Goose does not take issue with any of the criteria listed, but submits that three additional criteria should be added.

The first is that the CPUC should ensure that California ratepayers are not unduly harmed by whatever allocation process is put in place. In this regard, the CPUC should recognize that the costs incurred by the investor-owned utilities for the procurement of GHG

emission allowances in an auction will be passed through directly to ratepayers. Unless it is the intent of the State of California to take the revenue obtained from the auction of allowances to the IOUs and funnel it directly back to ratepayers,<sup>1</sup> they, not the utilities will bear the costs of a GHG auction process.

Second, the Commission should ensure that the allocation method chosen does not create an uneven playing field among the competitive energy service providers in the state. Wild Goose is an independent storage provider which offers natural gas storage services at market-based rates. Wild Goose has no captive customers. Any costs of obtaining GHG emission allowances through an auction process will, of necessity, be passed through in the rates it charges its customers, which are free to obtain service from a number of providers. In contrast, Pacific Gas and Electric Company provides, among other services, natural gas storage services both on a competitive base and to core, captive customers. PG&E's costs of obtaining GHG emission allowances for its natural gas storage operations through an auction process can be recovered directly from the rates it charges its core customers; PG&E does not have to increase the rates of its competitive storage services to recover its GHG allowance costs. PG&E could thereby gain a competitive advantage over Wild Goose as a direct result of the manner in which GHG emission allowances are allocated.

Finally the Commission should ensure that the allocation method chosen does not result in a disincentive for entities to build energy infrastructure which is vital to the economic future of California. An entity seeking to enter the California energy market, or one already in the market seeking to expand its facilities, should not be faced with the process of obtaining

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<sup>1</sup> See Question No. 8 in the October 15 Ruling which implies that such is a possibility. There would however still remain the issue of the time value of money.

costly emission allowances through an auction process. The cost of such allowances, once factored into the economics of the planned project, might render it no longer cost effective. California might thus be deprived of much needed energy infrastructure. Moreover, as the Climate Action Team Final Report indicates, gas used as a replacement fuel results in significant GHG reductions. In order for natural gas to provide such a benefit to California, the State must maintain, and promote growth in natural gas infrastructure, such as storage facilities.

All of the above criteria, which speak toward the fairness of an emission allowance distribution methodology would lean away from the adoption of an auction process and have the CPUC recommend the adoption of an administrative allocation of all or most of the emission allowances. Wild Goose would strongly support such a recommendation. To this end, Wild Goose believes that an administrative allocation of allowances would be consistent with the Market Advisory Committee's overall goal of distributing allowances "in a manner consistent with fundamental objectives of cost-effectiveness fairness and simplicity," as well the CPUC's objectives of protecting ratepayers and enhancing competition in the California energy market.

## **II. METHOD FOR ADMINISTRATIVE ALLOCATION OF EMISSION ALLOWANCES**

The October 15 Ruling provides three potential methods for the allocation of emission allowances; (a) grandfathering; (b) benchmarking; and (c) updating, and seeks comments thereon. As explained below, Wild Goose submits that either "benchmarking" or "updating," if designed properly, could provide an effective and fair means of allocating allowances, while grandfathering could raise a series of contentious issues, and lead to an unfair allocation.

In making a decision on which allocation method to recommend, the CPUC should recognize that embedded within the definition of each method is an inherent time element

– e.g., the time period over which any given allocation would last. Thus, for example, grandfathering is defined as “a method by which emission allowances are freely distributed to entities covered under an emission trading program based on historic emissions.” As there is no demarcation of how long such allocation would last, an allocation in perpetuity is inherent in the definition. Such an allocation can lead to all forms of market manipulation. In contrast, both benchmarking and updating have an element of change built into their respective definitions. This element allows the CPUC to recommend an allocation period. As detailed below, Wild Goose would suggest that an annual allocation would result in the most equitable distribution of emission allowances.

As alluded to above, both benchmarking and updating allow for a change in an entity’s operations over time. Benchmarking, which bases allocation on a level of permitted emissions per unit of input or output, would result in an entity which increases in size between allocation periods (and thereby increasing its input and/or output) to receive a larger allocation of credits as its operations change.<sup>2</sup> The same is true for the updating methodology which inherently recognizes changed circumstances and would allocate emission allowances using a factor which recognizes such change.

In order for either the benchmarking or updating allocation methodologies to be effective (i.e., capturing changes in circumstances), the allocation should be done on an annual basis and should be done using an allocation factor which is pervasive among all entities which will be afforded an allocation – e.g., fuel use. Moreover, in order to ensure that no allowances are left unused (or that there is no improper manipulation of the process), the allocation should

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<sup>2</sup> Wild Goose is assuming that the initial level of permitted emission per unity of input or output would be based on the entity’s prior year input or output levels.

be based on the prior year's (not upcoming year) fuel use. While Wild Goose recognizes that such an allocation will require new market entrants or those expanding their facilities in an upcoming year to go to the market to obtain the GHG allowances needed for the period of time prior to the next allocation cycle, such should not provide a significant deterrent to entry/expansion in the energy market given the recommended frequency of the allocation cycle.

In contrast to the equity inherent in both the benchmarking and updating methodologies, Wild Goose believes that an allocation process using a grandfathering methodology – basing the allowance on historic emissions – will insert significant controversy and a degree of inequity into the process. Such is evident by certain of the questions posed in the October 15 Ruling. For example, question 14 queries that “If emission allowances are allocated based on historical emissions (“grandfathering”) what base years should be used as the basis for this allocation.” Under such a process there are clearly winners and losers based on which base year is chosen. For example, if 2000 was chosen as a base year, the facility that expanded in 1999, and thus would get its needed allocation, would be a winner while the facility that expanded in 2001, and therefore would not get its full allocation would lose, having to go to the market to obtain the rest. Similarly, question 12 of the Ruling asks, “If new market entrants receive emission allowance allocations, how would the proper level of allocation be determined for them.” Under a grandfathering process, where allocations are based on historic emissions, it would be difficult to determine an equitable level of allocation. For example, if the new market entrant was afforded an allocation based on its current emissions it may achieve a distinct advantage over competitors which received an allocation based on historic (and perhaps lower) emissions.

The way to avoid these inequities is to place everyone on the same level – all participants in the allocation process will receive an allocation of emissions allowances based on prior year fuel input, with such allocation process to be repeated on an annual basis. Moreover, the use of a one year allocation based on prior year's fuel use would limit the potential for windfall profits, since excess allowances would only be good for one year, and at that time, the allowances would be recalculated. For example, if a facility which is allocated emissions allowances shuts down and therefore no longer needs its allowances for its operations, it will only have the opportunity to sell them into the open market for a year. After that the allowance would be recalculated based on prior year fuel use which would reflect the closing of the facility. Similarly, prior to the first allocation cycle, a facility which increased its operations beyond an economic point for the purpose of receiving a greater allocation of emission allowances, would only enjoy the ability to sell those "extra" credits into the market for a year. At the time of the annual allocation, its allowances would be reduced to reflect the lower level of operations (made necessary by the fact the extra credits were sold into the market).

### **III. CONCLUSION**

Wild Goose appreciates this opportunity to offer these comments on issues related to the distribution of greenhouse gas emission allowances. Wild Goose would simply request that the CPUC, in formulating its proposed recommendation to the Air Resources Board on which methodology to employ for such allocations, factor into its deliberations certain of the CPUC's fundamental policy objectives, as discussed above.



Respectfully submitted,

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October 31, 2007

3278/005/X93866.v1

**CERTIFICATE OF SERVICE**

I, Lisa Vieland, certify that I have on this 31st day of October 2007 caused a copy of the foregoing

**COMMENTS OF WILD GOOSE STORAGE, LLC ON ALLOWANCE  
ALLOCATION ISSUES**

to be served on all known parties to R.06-04-009 listed on the most recently updated service list available on the California Public Utilities Commission website, via email to those listed with email and via U.S. mail to those without email service. I also caused courtesy copies to be hand-delivered as follows:

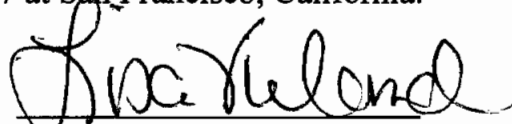
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I declare under penalty of perjury that the foregoing is true and correct. Executed this 31st day of October 2007 at San Francisco, California.

  
Lisa Vieland

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PUC/X93876.v1