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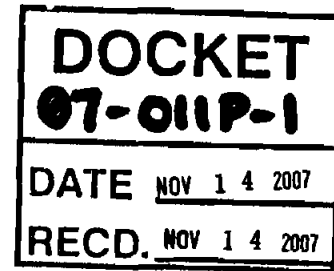
November 14, 2007

Joseph F. Wiedman

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**VIA E-MAIL & OVERNIGHT DELIVERY**

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



**Re: Docket No. 07-OIIP-01, Rulemaking 06-04-009, Comments of PacifiCorp**

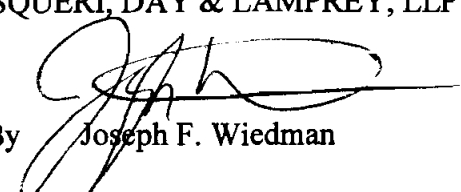
Dear Sir or Madam:

Attached please find an original copy of PacifiCorp's Reply Comments on Issues Related to the Distribution of Greenhouse Gas (GHG) Emissions Allowances 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  Joseph F. Wiedman

Enclosure

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

3219/003/X94357.v1

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

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 Commission Docket 07-OIIP-01

**REPLY COMMENTS OF PACIFICORP (U 901 E) ON ISSUES RELATED TO THE  
DISTRIBUTION OF GREENHOUSE GAS (GHG) EMISSIONS ALLOWANCES**

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Date: November 14, 2007

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

Order Instituting Rulemaking to Implement  
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Rulemaking 06-04-009  
(Filed April 13, 2006)

Energy Commission Docket 07-OHP-01

**REPLY COMMENTS OF PACIFICORP (U 901 E) ON ISSUES RELATED TO THE  
DISTRIBUTION OF GREENHOUSE GAS (GHG) EMISSIONS ALLOWANCES**

Pursuant to the *Administrative Law Judge's Ruling Requesting Comments and Noticing Workshop on Allowance Allocation Issues* dated October 15, 2007, PacifiCorp respectfully submits these reply comments addressing comments submitted by the parties on October 31, 2007, and raised during the subsequent joint workshop held November 5, 2007, on issues related to the distribution of greenhouse gas ("GHG") emission allowances. PacifiCorp appreciates the opportunity to provide further comments in this proceeding on these important issues.

**I. DISCUSSION**

PacifiCorp has reviewed parties' October 31, 2007 comments, as well as the comments made during the November 5, 2007 workshop. Given the volume of information and the challenges with responding to individual comments, PacifiCorp will follow the lead of various other parties during the joint workshop and articulate a more precise position on allowance allocation issues. PacifiCorp's position was highly fragmented in the initial set of comments because parties were asked to respond to specific questions.

**A. Should Emissions Allowances Be Auctioned or Allocated?**

Unlike most other California investor-owned utilities, PacifiCorp is a vertically-integrated utility owning approximately 80 percent of its generation portfolio, most of which is located outside the state. The rate impact risks to PacifiCorp's customers are disproportionately higher compared to the customers of other California utilities who have already divested themselves of fossil generation. Those deregulated utilities have had, for several years, the ability to contract away any potential stranded cost risk, while also placing new construction risk squarely on independent generators competing for their business.

PacifiCorp supports a free allocation of GHG emission allowances based upon the "grandfathering" or historical emissions method, which would place PacifiCorp in a better position to manage any adverse rate impacts on PacifiCorp's California customers. To the extent California decides to opt for the auction method, PacifiCorp encourages the state to adopt an approach that transitions from a free allocation of allowances, based upon historic emissions, to an auction in a manner that avoids rate shock.

PacifiCorp reiterates that the decisions to build fossil fuel power plants, which were made over many decades and were intended to achieve a fuel mix, were economically rational and in virtually all cases approved as prudent by regulatory authorities. Load serving entities and their customers should not be punished for past prudent decisions. PacifiCorp also vigorously opposes providing GHG emission allowances to non-emitters based on a "benchmarking" or megawatt-hour "output-based" methodologies. It will simply create large wealth transfers among utilities unrelated to the overall goal of emissions reduction. It is unclear what public purpose would be served by distributing allowances to non-emitters. Utilities that built hydroelectric dams many decades ago or nuclear plants in the sixties and seventies did not do so to avoid carbon dioxide emissions and there is no reason to provide them with a financial windfall. These zero-emitting resources do not bear the burden or the direct costs of effectuating greenhouse gas emissions reductions.

**B. How Should Allowances Be Distributed?**

PacifiCorp's opening remarks posited dividing the annual GHG emission allowance budget into three separate distributions: 1) a new entrant set-aside; 2) free allocations to emitters; and 3) an auction. As PacifiCorp urged within its earlier remarks, the amount budgeted for each should be the subject of further modeling with a goal of achieving the best combination of cost, fairness, and enforceability.

**1. Free Allocation for New Entrant Set-Aside**

PacifiCorp supports some nominal amount (< 3 percent) of the overall GHG emission allowance cap being set aside each year for new market entrants (with projects that will produce GHG emissions) prior to the distribution of the GHG emission allowances. PacifiCorp recommends that a load-based CO<sub>2</sub> cap-and-trade rule include a specific provision for new entrants, such as new self-generators who had not been previously served by a load serving entity, where the state would hold a "new entrant" GHG emission allowance set-aside each year. At the end of each year, the state would pro-rate any unused "new entrant" allowances to the various regulated entities. The California Air Resources Board would set the size of the allowance pool in rule.

**2. Free Allocation to Existing Emitters**

PacifiCorp proposed using 95 percent of the now adjusted annual GHG emission allowance budget for free GHG emission allowance allocations to existing emitters (i.e., which would either be the load serving entity under a load-based cap-and-trade approach or the load serving entity, an-state generator, or some combination of the two to accommodate the first seller/deliverer approach). To establish each existing emitter's share of the allocation, a statewide GHG baseline would need to be calculated using the most recent emissions data.

PacifiCorp supports calculating a statewide GHG baseline using multiple

historical years.<sup>1</sup> A baseline should rely on historical CO<sub>2</sub> emissions data from all existing emitters, using data from a five year period prior to the rule's effective start date. California would drop data from the years with the highest and lowest emissions for each existing emitter. Average emissions for the three remaining years would form the basis for distributing GHG emission allowances to each existing emitter. The sum of all existing emitters' GHG baseline emissions would establish the GHG baseline, with each existing emitters' three-year average emissions used to calculate its share (or ratio) of the initial GHG baseline and each subsequent year's GHG emission allowance budget (i.e., the declining emissions cap). Note, the ratio would not change, regardless of the decline in the overall cap or in the case of a gradual transition to an auction method for distributing allowances. This predictability is extremely valuable for new fossil-fueled resource development.

### 3. Auction Allocation

PacifiCorp has expressed support for some nominal level of auction ( $\leq 5$  percent) regardless of the regulatory approach to ensure GHG emission allowance market liquidity and an opportunity for trading. PacifiCorp also supports the state conducting at least two auctions a year. To the extent auction proceeds are returned to the load serving entities to manage the rate impacts, as has been suggested by some participants, PacifiCorp concurs that the increased cost of the auction method on customer rates could be partially mitigated. PacifiCorp supports auction proceeds returning to the electricity sector and their use toward achieving the overall goal of GHG emissions reductions.

However, under any auction method, PacifiCorp continues to be concerned about the creation of artificial scarcity. Where GHG emission allowances are auctioned, there is a risk of, and, indeed, an incentive for, non-generators bidding to acquire allowances. Financial

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<sup>1</sup> When establishing a GHG baseline, evaluating a larger number of years allows the state to more equitably address year-over-year hydro production variability and accommodate unit-specific concerns, such as reduced emissions as a result of scheduled maintenance or unscheduled outages.

speculators could participate, hoping to acquire allowances cheaply and sell them to companies that need them to operate at a higher price. The risk alone could drive up the bid price in these auctions. As the cost of acquiring allowances eventually will be passed on the California electricity consumers, market manipulation that drives up the cost of allowances, the supply of which will be limited, should be prevented.

Restricting auction participation is the most direct way to address this risk. Rules for bidders could include either currently being a first-seller of electricity in California, having a pending application for a California-based generation unit, or being able to show to the satisfaction of regulatory staff that they have a good faith and reasonable expectation that they will be a first seller in California during the compliance period for which the allowances apply—coupled with administrative/criminal penalties if they are shown not to have pursued such plans in good faith during the compliance period.

### **C. Other “GHG Emission Allowance” Design Considerations**

PacifiCorp supports California adopting a GHG emission allowance banking provision, whereby an owner could “bank” any surplus allowance for use within a future compliance period. However, to address artificial scarcity, auctioned allowances should have an identified expiration date, such as two years from the date of auction. Such a rule would ensure market liquidity.

PacifiCorp respectfully requests that the Commission carefully consider the impact of its GHG rules on PacifiCorp and other small multi-jurisdictional utilities (collectively, “SMJUs”). The combination of utility-owned generating resources and resources providing contracted for power located throughout the western United States, coupled with load-serving responsibilities and multi-state cost structures, places SMJUs in the complicated position of having to equitably assign the costs of system energy, including emissions/allowances, to each state’s retail load. The Commission has recognized the unique implementation issues facing SMJUs, most notably within the Renewable Portfolio Standard Program, R.06-02-012. Unlike

large California investor-owned utilities, PacifiCorp's generating assets and power purchases are not used exclusively to serve California retail load and PacifiCorp does not rely significantly on unspecified power purchases.

## **II. CONCLUSION**

The distribution method proposed by PacifiCorp will inherently minimize the rate impacts for its customers as well as those of other existing emitters. These customers bear the greatest direct cost of complying with the new rule. PacifiCorp's preferred method preserves the integrity of the emissions cap and allows the regulated entity to more easily manage and plan for an ever-declining allowance allocation.

The proponents of alternative GHG emission allowance distribution methods bear the burden of demonstrating to the Commission that their preferred approach will avoid rate shocks not only to PacifiCorp's customers, but to the customers of other similarly situated existing emitters. As stated before, PacifiCorp believes its preferred distribution method should be the subject of further modeling and optimized to achieve the best combination of cost, fairness, and enforceability.

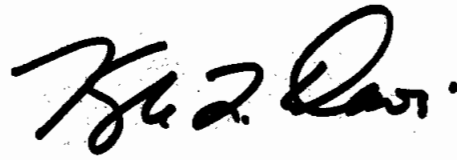
PacifiCorp appreciates the opportunity to submit reply comments on issues raised by the parties related to the distribution of GHG emission allowances. For all the foregoing reasons, PacifiCorp recommends that the Joint Staff adopt PacifiCorp's preferred GHG emission allowance distribution method and, in the alternative, consider developing an allowance distribution method for SMJUs and their unique circumstances.



Dated: November 14, 2007

Respectfully submitted,

By

A handwritten signature in black ink, appearing to read "Kyle L. Davis". The signature is stylized with a large, looped "K" and a cursive "Davis".

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**CERTIFICATE OF SERVICE**

I, Lisa Vieland, certify that I have on this 14th day of November 2007 caused a copy of the foregoing

**REPLY COMMENTS OF PACIFICORP (U 901 E) ON ISSUES RELATED  
TO THE DISTRIBUTION OF GREENHOUSE GAS (GHG) EMISSIONS  
ALLOWANCES**

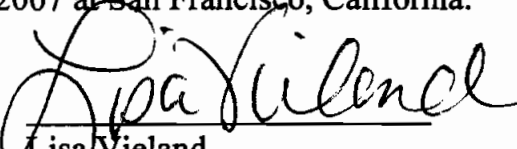
to be served on all known parties to R.06-04-009 listed on the most recently updated service list available on the California Public Utilities Commission website, via email to those listed with email and via U.S. mail to those without email service. I also caused courtesy copies to be hand-delivered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

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I declare under penalty of perjury that the foregoing is true and correct. Executed this 14th day of November 2007 at San Francisco, California.

  
Lisa Vieland

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Last Updated 11/13/07

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