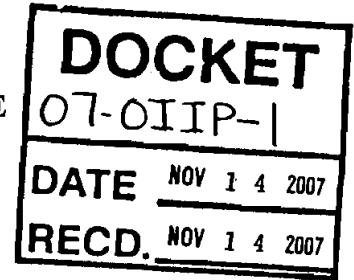


**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**



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

R.06-04-009
(Filed April 13, 2006)

**REPLY COMMENTS OF CALPINE CORPORATION ON
ALLOWANCE ALLOCATION ISSUES**

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Dated: November 14, 2007

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**REPLY COMMENTS OF CALPINE CORPORATION ON
ALLOWANCE ALLOCATION ISSUES**

Pursuant to the October 15, 2007 ruling of Administrative Law Judges TerKeurst and Lakritz ("October 15 ALJ Ruling"), Calpine Corporation ("Calpine") submits this reply to comments on the allocation of greenhouse gas ("GHG") emission allowances. Specifically, Calpine replies to proposals to (1) implement a 100% allowance auction at the outset of the cap-and-trade program; (2) allocate allowances (or allowance revenues) *only* to load serving entities; and (3) allocate allowances based on "grandfathered" emission levels. In addition, Calpine replies to the hybrid auction/grandfathering approach proposed by Southern California Edison ("SCE").

For the reasons discussed herein, and in Calpine's opening comments, the Commission should reject the above proposals in favor of a fuel neutral, regularly updated, output-based approach for the allocation of allowances to entities subject to AB 32, gradually transitioning to a complete auction system over time. Such an approach is consistent with the policy goals in Assembly Bill ("AB") 32, will provide important incentives for investment in low-GHG technologies, and will help mitigate costs associated with transitioning to a cap-and-trade system.

I. CERTAIN KEY PRINCIPALS MUST INFORM THE COMMISSION'S DECISION

In considering the comments filed by parties, it is critical that the Commission keep the fundamental goal of AB 32 in mind – reducing GHG emissions in the most efficient and cost-effective manner.¹ This is the lens through which Calpine has considered the comments of other parties in this proceeding and should be the basis for the Commission's evaluation as well. Specifically, to reduce GHG emissions in the most efficient and cost-effective way for all affected parties – consumers, generators, and load serving entities ("LSEs") - the allowance allocation methodology adopted by the Commission must:

1. Avoid perverse incentives that discourage or penalize investment in low-GHG technologies and, instead, recognize, reward, and encourage continued investment in such technologies;
2. Ensure liquidity in the emissions allowance market;
3. Avoid interference with the operation of an open, liquid, and competitive wholesale electricity market;
4. Not threaten grid reliability;
5. Distribute allowances directly to entities that are regulated under the program;
6. Not discriminate between in-state and out-of-state resources; and
7. Send appropriate price signals to consumers to encourage increased energy efficiency.

In addition, AB 32 contemplates that the policies adopted by California will serve as a model for developing GHG emissions programs on a regional or national level.² Thus, it is important for the Commission to consider how different approaches to allocating allowances will function at a regional or national level and, if adopted on such a broad scale, how a particular

¹ Health and Safety Code § 38501(h).

² Health and Safety Code § 38501(d).

allowance allocation approach might impact California residents, businesses, and economy as a whole.

The approach that best meets all these principals is one in which allowances are administratively allocated to entities subject to the emissions cap using an output-based benchmark that is regularly updated, and which transitions to a full auction system over time. This allocation method will provide important incentives for investment in low-GHG technologies and fuels, and help mitigate compliance costs during the initial transition to a cap-and-trade system.³

II. A 100% ALLOWANCE AUCTION AT THE OUTSET OF THE CAP-AND-TRADE PROGRAM COULD RESULT IN UNACCEPTABLE MARKET VOLATILITY

Several parties, including The Utility Reform Network (“TURN”)⁴ and Morgan Stanley Capital Group,⁵ support the implementation of a 100% allowance auction at the outset of the cap-and-trade program. TURN, for example, believes that a 100% auction would appropriately reward entities that have already invested in low-GHG technologies and is consistent with the environmental principle of “polluter pays.”⁶ As Calpine discussed in its opening comments, an output based allocation approach would achieve these same goals *and* mitigate compliance costs during the early years of the program.

³ Calpine believes that its proposed allocation method is appropriate regardless of whether a first-seller or load-based approach is adopted. However, these reply comments should be taken in the context of a first-seller system. If the point of regulation is directed at LSEs, Calpine believes a certificate based tracking system, such as the tradable emission attribute certificates (“TEAC”) approach is worth exploring. As Calpine understands the TEAC approach, allowance allocation issues require somewhat different considerations, as all LSEs would have equal access to certificates and would not be locked into the emission rates of owned assets and existing contracts. Calpine will provide more specific comments on the TEAC model in its response to the November 9, 2007 ruling of Administrative Law Judges TerKeurst and Lakritz requesting comments on type and point of regulation issues.

⁴ TURN Comments at 10-12.

⁵ Morgan Stanley Comments at 2, 15-16.

⁶ TURN Comments at 11.

In proposing an immediate auction approach, some parties apparently assume that generators will be able to recover 100% of their auction-related costs in the wholesale energy market. This likely will not be the case. The price of GHG allowances will only be one of many factors that determines wholesale electricity prices once a GHG cap-and-trade program is implemented. Factors such as transmission constraints, contractual obligations, and other regulatory requirements (*e.g.*, “must-run” obligations) prevent the wholesale electricity market from being perfectly competitive, which results in generators not being able to fully recover allowance costs. Indeed, a study of the impact of the European emission trading system on the power sector found that, in some wholesale markets, as little as 60% of allowance costs are recovered in the wholesale market.⁷

Furthermore, as Calpine has previously discussed, an immediate 100% auction of allowances could create unacceptable market volatility due to uncertainty regarding allowance prices, and such uncertainty would likely be exacerbated by the lack of experience with auctioning allowances under a GHG cap-and-trade system. To mitigate price volatility at the outset of the cap-and-trade program, the majority of allowances should be freely allocated to entities subject to the cap in the early years of the program, with a gradual transition toward a 100% auction as the primary method for distributing allowances in later years. Such an approach would give all affected parties a period of time to adjust to the cost implications of emissions reduction measures and the cap-and-trade program.

For instance, a gradual transition to 100% auctioning will allow entities subject to the cap to adopt, implement, and pay for emissions reduction measures without eliminating or reducing incentives to shift dispatch to more low-emitting resources and encourage investment in low-

⁷ Jos Sijm et al., *CO₂ Cost Pass through and Windfall Profits in the Power Sector* (2006).

GHG technologies. This is because the allowance price in the secondary market (which is a function of the level of the cap and the cost of GHG emission reductions) – not the method of allocating allowances - creates these incentives by changing the relative price of high- and low-emitting generation.

A phase-in of allowances also reduces the potential for windfall profits in the electric sector, because entities subject to the cap would not be allocated allowances in perpetuity. As the proportion of allowances auctioned increases, so too do the compliance costs to regulated entities. The increased compliance cost reduces the potential for windfall profits to these entities.

III. ALLOCATING ALLOWANCES OR ALLOWANCE REVENUES *ONLY* TO LOAD SERVING ENTITIES DOES NOT REWARD PAST INVESTMENT IN LOW-GHG TECHNOLOGIES NOR ENCOURAGE ADDITIONAL SUCH INVESTMENT IN THE FUTURE

Several Parties, including Pacific Gas and Electric Company (“PG&E”),⁸ San Diego Gas & Electric Company/Southern California Gas Company (“SDG&E/SoCalGas”),⁹ and the Natural Resources Defense Council/Union of Concerned Scientists (“NRDC/UCS”),¹⁰ propose distributing the value of allowances only to LSEs under a first-seller approach as a way to mitigate expected increases in retail electricity rates. There are two variants of this proposal – one is to allocate auction revenues to LSEs; the other is to directly allocate allowances to LSEs for subsequent auction or sale to first sellers. Both variants rely on the principal that consumers should not bear the costs of GHG emissions reduction measures.

⁸ PG&E Comments at 1-2, 18.

⁹ SDG&E/SoCalGas Comments at 11.

¹⁰ NRDC/UCS Comments at 5 and 11.

Calpine agrees that the method for allocating allowances should avoid a transfer of wealth from consumers to producers; and, in particular, minimize the potential for windfall profits. The goal, however, should *not* be to eliminate *any return on investment* under a cap-and-trade system - but rather to ensure that revenues are linked to actual emission reductions and that such reductions are achieved in the most efficient and cost-effective manner. To be sure, the development and construction of low-GHG technologies will necessarily have costs, but it is important that entities that invest – or have already invested - in these technologies be compensated. Indeed, AB 32 requires emission reduction measures to recognize and reward entities that have taken early action:

(b) In adopting regulations pursuant to this section and Part 5 (commencing with Section 38570), to the extent feasible and in furtherance of achieving the statewide greenhouse gas emissions limit, the state board shall do all of the following:

(1) Design the regulations, including distribution of emissions allowances where appropriate, in a manner that is equitable, seeks to minimize costs and maximize the total benefits to California, and *encourages early action to reduce greenhouse gas emissions*.

...

(3) Ensure that entities that have voluntarily reduced their greenhouse gas emissions prior to the implementation of this section *receive appropriate credit for early voluntary reductions*.¹¹

Furthermore, proposals to fully allocate the value of allowances to LSEs will completely shield consumers from bearing any of the costs associated with GHG emissions reductions. Shielding consumers from emissions reduction costs means that consumers will not be getting accurate price signals that might otherwise incentivize them to implement energy efficiency

¹¹ Health and Safety Code § 38562(b) (emphasis added).

measures or participate in demand response programs. This is particularly true for consumers of LSEs that rely on lower cost, higher-emitting resources.¹²

In addition, proposals, such as the PG&E proposal, whereby allowances (rather than allowance revenue) would be directly allocated to LSEs for subsequent auction to first-sellers are anti-competitive and patently unfair as they would give control of the auction process to a certain segment of market participants. Specifically, by concentrating a disproportionate share of allowances in the hands of a small number of market participants (*i.e.*, LSEs), liquidity in the allowance market would be reduced, making it more difficult for the market to find the most cost effective means for reducing emissions.

Furthermore, and perhaps most importantly, allocating allowances only to LSEs raises market power concerns. Because some LSEs – in particular the IOUs – own generation assets, LSE-owned assets would likely have preferential access to allowances to the detriment of independent power producers and power marketers. Independent power producers and power marketers compete on a head-to-head basis with LSE-owned resources in the wholesale energy market. Thus, allocating allowances only to LSEs harms competition.

From an administrative perspective, having each LSE hold an auction for allowances¹³ would be an unnecessarily complicated and administratively burdensome approach. It is Calpine's understanding that there are approximately 55 LSEs operating in California, which means that under PG&E's proposal, there could be 55 separate allowance auctions (assuming that each LSE holds only one auction – which would be unlikely). In addition, given that

¹² As discussed in its opening comments, Calpine agrees that it may be appropriate to adopt measures that will mitigate rate impacts for low-income consumers. These measures, however, should not be part of the adopted allowance allocation scheme; but rather, should, be addressed through other regulatory ratemaking policies.

¹³ Although PG&E seems to suggest that allowance auctions could be held by a third-party administrator, its proposal does not suggest that this is the preferred method nor does it preclude individual LSEs from holding their own allowance auctions.

generators often provide power to several LSEs from the same generation resource, PG&E's proposal would seem to require the same generation resource to participate in multiple auctions in order to obtain the allowances needed to provide power to each LSE. It is also unclear whether small LSEs would have the ability, or resources, to hold allowance auctions and in what ways auction revenues would be used to further the goals of AB 32. AB 32 requires that emission reduction measures "minimize" administrative burdens.¹⁴ PG&E's approach would do just the opposite.

IV. ALLOCATING ALLOWANCES BASED ON "GRANDFATHERED" EMISSION LEVELS UNDERMINES THE GOALS OF AB 32

Dynegy and others support allocating allowances based on historic emissions performance.¹⁵ Although these parties use a variety of terms to describe their proposals, this approach represents a "grandfathering" system for allocating allowances. According to Dynegy, a benefit of a grandfathering approach is that it recognizes reliability benefits provided by existing resources and "offsets some of the loss of market values of these [legacy] resources."¹⁶ These parties are wrong.

Allocating allowances based on grandfathered emission levels rewards high-emitting generators by reducing their compliance costs, which in turn, may prolong the life of these resources. Prolonging the life of inefficient, dirty generating resources is clearly contrary to the goals of AB 32 – in particular provisions which, as discussed above, require emission reduction measures to recognize and reward entities that have taken early action to reduce their

¹⁴ Health and Safety Code § 38562(b)(7).

¹⁵ Dynegy Comments at 4, 8. *See also* SCE Comments at 20; AES Southland Comments at 8-9.

¹⁶ Dynegy Comments at 8.

emissions.¹⁷ Moreover, grandfathering provides a disincentive for entities to shift to low-GHG technologies since to do so would result in loss of allowances – again, something that is contrary to the purpose of AB 32. The net effect is that compliance costs for low-emitting generators will go up relative to existing, inefficient generation. Penalizing low-emitting resources in such a way threatens the long-term success of the State’s emissions reduction efforts.

A grandfathering approach would also hinder the development of new low-emission generation because new entrants would not, by definition, have historic emissions. Thus, new entrants would not be eligible for an administrative allocation of allowances under a grandfathering approach. The costs of purchasing allowances would both disadvantage new entrants, relative to existing resources, and increase the cost of generation in general. In contrast, if properly structured, a regularly updated, output-based allocation methodology could better ensure that new entrants are on equal footing with existing resources because allowances would be allocated to new entrants based on their projected output – which would be driven by the expected efficiency of the new entrant.¹⁸

In addition, under an output-based allocation methodology, grid reliability would not be threatened. On the contrary, resources needed to ensure reliability will still be available – only, under an output based allocation approach, generators would be encouraged to maximize the use of their most efficient generation units. Shifting to more efficient generating units would not result in a reduction of allowances but rather increase the number of allowances a generator would be allocated in the next update. In this way, an output-based allocation is better aligned with carbon price incentives to change generator dispatch.

¹⁷ See discussion of Health and Safety Code § 38562(b), *supra* Section 3.

Perhaps most importantly, if frequently updated, an output-based allocation would put downward pressure on wholesale electricity prices, something that would not occur under a grandfathering approach. This is because, when updated, output-based allocations incentivize increases in power production from the most efficient generating units. As generation shifts to more efficient, lower-emitting resources, these resources would receive a corresponding increase in the amount of allowance allocated, which in turn incentivizes additional increases in efficiency. Overall, this will tend to shift the supply curve upward, and prices downward.

V. SCE'S PROPOSAL COMBINES THE WORST ELEMENTS OF THE AUCTION AND GRANDFATHERING APPROACHES

SCE supports a first-seller approach and proposes to allocate allowances based on an assessment of "economic harm." SCE's proposal results in a hybrid allocation, whereby a small proportion of allowances would be freely allocated to first-sellers, but the majority of allowances would be allocated to LSEs, at no cost, for (1) their own use (*regardless of whether the LSE's individual generating units are high- or low-emitting*); or (2) subsequent auction to first-sellers. Moreover, the greatest proportion of allowances would go to LSEs that are dependent on high-emitting resources. In addition, SCE's proposal would allocate allowances at no cost to high-emitting in-state generators, or out-of-state generators with long-term contracts with a California LSE. In other words, SCE's proposal adopts a grandfathering approach to allocating allowances and will result in LSEs receiving a disproportionate share of allowances relative to generators.

As an initial matter, SCE's proposal is confusing, complicated, and would seem to present an administrative nightmare (assuming one could figure out the intricacies of the proposal). Such traits are inconsistent with AB 32, which requires the measures being

¹⁸ As explained in its opening comments, Calpine recommends that allowances be allocated to new market entrants from a "new entrants allowance pool" *see* Calpine Comments at 14 (Response to Q 12). When the allowance

considered in this proceeding to “[m]inimize the administrative burden of implementing and complying with [emission reduction] regulations.”¹⁹ It is also unclear, as a practical matter, how economic harm will be calculated or how those who actually suffer “economic harm” will be identified. SCE claims that most of the data needed to calculate economic harm “is readily available in the public domain”²⁰ but it has not identified specific source documents. It is unclear to Calpine whether the detailed information that would be necessary to calculate harm under SCE’s proposal is, indeed, readily available, much less in the public domain.

As to its substance, SCE’s proposal is inconsistent with the goals of AB 32 and should be rejected for the following reasons:

- Because SCE’s proposal relies heavily on grandfathering, it rewards high-emitting resources and penalizes newer, low-GHG technologies.
- It concentrates allowances in the hands of large LSEs, reducing liquidity in the secondary market and increasing the potential for market power abuses.
- It gives a competitive advantage to LSE-owned assets because these resources would receive free allowances regardless of their emissions profile, while independent power producers and power marketers would have to purchase allowances. SCE’s position is based on the false assumption that LSE’s are not able to pass through costs or sell into the market.
- It treats in-state resources differently than out-of state resources.
- It would result in higher costs for entities subject to the cap that are not allocated free allowances (*i.e.*, first sellers).
- SCE’s calculation of economic harm to LSEs (as measured by costs to consumers) is based solely on the increase in costs due to allowances prices. By proposing to reimburse consumers (LSEs) for this economic harm, SCE suggests that consumers should not bear any of the cost associated with emission reductions. While consumers should not be expected to transfer wealth to

allocation is “updated” these formerly new entrants would be treated as existing resources.

¹⁹ Health and Safety Code § 38562(b)(7).

²⁰ SCE Comments at 5.

generators in the form of windfall profits, consumers should be responsible for the costs of achieving actual emission reductions.

SCE argues that its approach is necessary because “some generators will be harmed on the basis of decisions they made prior to the implementation of AB 32.”²¹ This logic simply defies sound business principles, and risk management and practices. Although AB 32 was only recently adopted, concerns over GHG emissions and climate change have been growing since the early 1990s. Based on these concerns, many generators, including Calpine, invested in cleaner, lower-emitting, generation assets, despite the fact that it was likely that the short-term return on these investments would not be as high as the return on higher-emitting assets. In stark contrast to the requirements of AB 32,²² SCE’s proposal would penalize generators that took early action to reduce their GHG emissions profile. An output-based allocation is consistent with the goals in AB 32 because it implicitly rewards these early actors and offsets the costs of these investments.

SCE’s proposal is inconsistent with key principles in AB 32 and represents a step backwards in the State’s quest to efficiently and cost-effectively reduce GHG emissions. Accordingly, the proposal should be rejected.

VI. CONCLUSION

The Commission must keep in mind that the allowance allocation approach that it adopts in this proceeding may have wide ranging impacts beyond California. Specifically, AB 32 contemplates California serving as the model for a regional or national GHG emissions program. Thus, the Commission should consider how different approaches to allocating allowances will function at a regional or national level.

²¹ SCE Comments at 19.

²² Health and Safety Code §§ 38562(b)(1) and (3).

For instance, if adopted more broadly, Calpine believes that a grandfathering approach to allocating allowances will likely reward states with high emitting resources relative to their population (such as Wyoming, West Virginia, and Montana) and punish states, like California, that have encouraged the development of low-emitting resources. As discussed above, AB 32 requires that early actors receive "appropriate credit" for having already reduced their GHG emissions. A grandfathering approach would penalize these entities.

As discussed above and in Calpine's opening comments, to ensure that the goals of AB 32 are met, the Commission should adopt a fuel neutral, regularly updated, output-based approach for allocating allowances, which would gradually transition to a complete auction system over time. Such an approach is consistent with the policy goals in AB 32, will provide important incentives for investment in low-GHG technologies, and will help mitigate costs associated with transitioning to a cap-and-trade system.

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CERTIFICATE OF SERVICE

I, Judy Pau, certify:

I am employed in the City and County of San Francisco, California, am over eighteen years of age and am not a party to the within entitled cause. My business address is 505 Montgomery Street, Suite 800, San Francisco, California 94111.

On November 14, 2007, I caused the following to be served:

**REPLY COMMENTS OF CALPINE CORPORATION ON
ALLOWANCE ALLOCATION ISSUES**

via electronic mail to all parties on the service list R.06-04-009 who have provided the Commission with an electronic mail address and by First class mail on the parties listed as "Parties" and "State Service" on the attached service list who have not provided an electronic mail address.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on the date above at San Francisco, California.

/s/ Judy Pau

Judy Pau

cc: Commissioner Michael R. Peevey (via U.S. Mail and Email)
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CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

**Proceeding: R0604009 - CPUC - PG&E, SDG&E,
Filer: CPUC - PG&E, SDG&E, SOCALGAS, EDISON
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