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)

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Order Instituting Informational Proceeding AB-32 Implementation: Greenhouse Gases	Docket 07-OIIP-01

COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) AND SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) ON ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING COMMENTS ON TYPE AND POINT OF REGULATION 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 Judge's Ruling Requesting Comments on type and point of regulation issues* (the "ALJ Ruling"), dated November 09, 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.[1/]

The ALJ Ruling sets forth specific questions to be addressed which focus on the general type and point of regulation to be used to reduce greenhouse gas ("GHG") emissions in the electrical sector.[2/] The ALJ Ruling provides that parties should not repeat any comments previously submitted, and should instead focus on questions and

[1/] Ruling by ALJs TerKeurst and Lakritz available at http://docs.cpuc.ca.gov/efile/RULINGS/75038.pdf.

areas where they have not already provided comment.[3] The ALJ Ruling further invites parties to submit their comprehensive proposal for the general type and point of regulation for the electricity sector, taking into account their responses to the specific questions.[4] SDG&E and SoCalGas support implementing GHG type and point of regulation that allows the State to facilitate achievement of the maximum legally feasible and cost-effective GHG reduction rules, regulations, programs, mechanisms, and incentives under its jurisdiction, while maximizing integration to regional, national, and international GHG reduction programs.

II.
COMMENTS TO QUESTIONS

General

1. *What do you view as the incremental benefits of a market-based system for GHG compliance, in the current California context?*

Response: Regulated entities within and across sectors and locations will have different internal GHG abatement cost curves which, on the basis of experience and analysis to date, will be significant. A market-based system provides price visibility and access to the global marginal price of abatement and would allow participating entities to make better trade-offs to find the lowest overall cost of compliance. Such systems also provide the necessary incentive to entities with a greater endowment of low-cost abatement options to continue to act beyond their own compliance levels. This is further amplified when appropriate offset programs are added. Market design is important, however, to ensure that the marginal price of credits mirrors marginal abatement cost.

2. *Can a market-based system provide additional emissions reductions beyond existing policies and/or programs? If so, at what level? How much of such additional emission reductions could be achieved through expansion of existing policies and/or programs?*

Response: Market based mechanisms provide additional reductions, at a minimum, to the extent that they allow entities that have insufficient internal options (after using any banking and borrowing features) to comply to meet their reduction obligations rather than

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[2] *Id.* at p. 1.
[3] *Id.*
[4] *Id.*

facing penalties. Depending on program design, a market-based system could cause overall reductions to exceed the overall cap. More certainly though, it would reduce the overall cost. A market-based system can provide additional emissions reductions beyond existing policies and programs and beyond what can be achieved through expansion of existing policies and programs. A market-based system provides incentives to find additional reductions that may not have occurred to regulators, may be too small or difficult to mandate, and/or may come about through the adoption of a new technology or innovation. The exact amount of additional reductions beyond what is available through existing policies and programs is unknowable.

Principles or Objectives to be Considered in Evaluating Design Options
Public Utilities Commission Staff proposes that the following principles or objectives be used to evaluate GHG program design options and to develop recommendations regarding a GHG regulatory approach. The objectives are not presented in any particular order.

- ***Goal attainment:*** *Does the approach being considered have any particular advantages in terms of meeting overall emission reduction goals? For example, does the approach have any advantages to promoting energy efficiency, combined heat and power, or renewable energy?*
- ***Cost minimization:*** *Is the approach likely to minimize the total cost to end users of achieving a given GHG reduction target?*
- ***Compatibility with wholesale markets and the Market Redesign and Technology Upgrade:*** *What are the implications of the approach on efficient functioning of wholesale markets generally and the California Independent System Operator day-ahead and real-time markets?*
- ***Legal risk:*** *Is the approach at greater relative risk of being delayed or overturned in court?*
- ***Environmental Integrity:*** *Does the approach mitigate or allow contract shuffling and the leakage of emissions occurring outside of California as a result of efforts to reduce emissions in California?*
- ***Expandability:*** *Would the approach integrate easily into a broader regional or national program? A related consideration is the suitability of the approach as a model for a national or regional program.*
- ***Accuracy:*** *Does the approach support accuracy in reporting and, therefore, ensure that reported emission reductions are real?*
- ***Administrative Simplicity:*** *Does the approach promote greater simplicity for reporting entities, verifiers, and state agency staff? How easy will the program design be to administer?*

3. *Do you agree with this set of objectives? Are there other objectives or principles that you wish to see included? If so, please include your recommendations and reasoning. Finally, please rank the objectives above, and any additional factors you propose, in order of importance.*

Response: SDG&E would add the safety and reliability of the electric system to the list of objectives (this would be broader than compatibility with MRTU).

The criteria for assessing the point of regulation should be arranged in a hierarchy of criteria. First, the legal issues should be addressed. The design of a market structure for achieving GHG reductions should be a choice only between legally allowed options. Second, "mission critical" criteria should be defined for the electric sector to include safety and reliability, and the over-arching objectives of AB32 of emissions reductions and cost effectiveness: feasibility, verifiability, and cost minimization. The over-arching objectives of AB 32 are contained in the above list under items of "goal attainment", "cost minimization", and "accuracy." If those criteria are close to equal across alternate points of regulation, the other factors should be considered: expandability and administrative simplicity.

The "environmental integrity goal" has been an area of dispute in the reading of AB 32. SDG&E believes the goal is to reduce California's GHG footprint and not to try to control other states' GHG efforts through California's regulations. If the environmental integrity goal is included solely to not allow California LSEs to reduce their GHG content by signing contracts with existing low GHG emitting electric generation resources, SDG&E would remove it from the list.

Load-Based Cap-and-Trade System Design

Under a load-based approach, the regulated entities would be the retail providers of electricity to California consumers. Retail providers would be required to surrender allowances for the GHG emissions associated with all power sold to end users in California. Generators would not have a compliance obligation under this system, except possibly for exported power, as discussed in more detail below.

4. *With a load-based cap-and-trade system, should exports from in-state generation sources be included and accounted for under the cap? Why or why not? If so, how? For example, exports could be captured in a cap-and-trade system by regulating in-state sources that export, or by counting the emissions associated with exported power, without any compliance obligation on the exporter. There may be other options as well.*

Response: Yes, exports should be included in order to achieve the legislative objectives of AB32 and avoid California emission increases that could otherwise result from increase exports of electricity generated within California. Exports of electric generation should be considered part of a multi-sector cap-and-trade program with other point sources since it is mandated by AB 32. Specifically, AB 32 requires the state board to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG reductions from all sources or categories of sources subject to its jurisdiction.[5/] SDG&E also notes that for a load-based cap to work there must be an

[5/] Assembly Bill (AB) 32, §§ 38560 - 38574 (2006, Ch. 488).

improved tracking system compared to what exists today. With an improved tracking system, the small amount of exports (less than 5,000 GWh) should be able to be tracked from sources that will be regulated by the Air Resources Board (ARB) and reporting their GHG emissions to ARB.

5. *How extensive do you view the threat of contract shuffling under a load-based program, given the accessibility of clean resources within the western interconnect? What mechanisms do you propose to combat this possibility? On what basis do you support your position? Under a load-based system, three basic options may be used to match a retail provider's load to the sources of electricity used to serve the load: (1) the use of contracts and settlements data, (2) the development of a tracking system to facilitate matching sources to loads, with unclaimed sources pooled and assigned to all retail providers for any electricity that cannot be accounted for on a specified basis, and (3) the use of a tracking system and tradable emission attribute certificates (TEAC) to ensure that all electricity is assigned.*

Response: "Contract shuffling" in SDG&E's view is that contracted-for power is not actually produced, or is produced but sold to another entity, with higher emitting resources substituted by the seller. Contracting for and using lower emitting power should not be prohibited in a California-only regulatory program. SDG&E believes that for a load-based cap to work there must be an improved tracking system compared to what exists today. With an improved tracking system, sources will be matched to loads to assure that power contracted for by California LSEs has in fact been generated and has been injected into the WECC grid.

6. *Which of these systems best accounts for all imports? What are the advantages and disadvantages of each potential tracking system in terms of accuracy, cost of development and administration of tracking systems, costs of administration to the parties, and overall costs to ratepayers? Are there alternative tracking approaches that you would recommend, and for what reasons?*

Response: For a load-based system, it is not just imported power that is at issue, but all short-term power trades within the State. For a load-based cap to work, there must be an improved tracking system relative to what exists today. SDG&E has the same information as the CPUC, as derived from CPUC workshops, on the feasibility of expanding WREGIS to track all power in the WECC.

7. *If a load-based approach is pursued, would the potential benefits of a full TEAC system be great enough to warrant the start-up and administrative costs?*

Response: For a load-based cap to work there must be an improved tracking system relative to what exists today for all short-term traded power. SDG&E does not have an opinion on TEACs at this time. SDG&E may respond in reply comments to other parties' discussions of TEACs.

Source-based Cap-and-trade System Design Options

Pure Source-based (GHG Regulation of In-state Generation Only)

Under an in-state-only source-based approach, the regulated entities would be the power plants located in California that generate electricity and emit GHGs. Under such a system, electricity use associated with imports would not be directly regulated under the cap-and-trade system. Instead, other policies and programs such as energy efficiency and the Renewable Portfolio Standard (RPS) would be utilized to decrease reliance on imported GHG-intensive power sources.

8. *Do you view this approach as compliant with Assembly Bill (AB) 32? Please support your answer.*

Response: No. AB 32 requires the state board to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG reductions from all sources or categories of sources, in furtherance of achieving the statewide GHG emission limit subject to its jurisdiction.[6/] While the state board's jurisdiction cannot be interpreted so broadly as to export environmental measures or enable the state board to legally and effectively impose direct GHG reduction measures on the electricity importers, the board's jurisdiction clearly reaches the regulated purchasers, which would provide the necessary contractual nexus with imported power, and that may be directly regulated under the cap-and-trade system.[7/]

The threat of leakage can be viewed over two time horizons: short-term and long-term.

9. *In light of the relatively high capacity factors of carbon-intensive facilities outside the state, how extensive do you expect the short-term threat of substituting higher-carbon imports for in-state generation to be? Might this possibility be dealt with through specific program design (e.g., allocations, limiting conditions, etc.)?*

Response: SDG&E agrees with the analysis of the CEC for the Southwest in its reports on the generation mix of California electricity imports in 2006, CEC-700-2006-007 and CEC-700-2007-007. It is likely that only a very small portion of the power imported into California currently is coal power. A similar analysis of the Northwest will likely produce similar findings. As long as new coal plants do not come on line and carbon costs are imposed equally on in-state and out-of-state sources, SDG&E does not see a change in the composition of power being imported into California except for the increase in renewable power imported into the State. If in-state generation is required to buy GHG allowances, but imports do not, then it would be expected that short-term unspecified power would be composed of a larger amount of imports. However, it is not

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[6/] Assembly Bill (AB) 32, § 38505(m), §§ 38560 - 38574 (2006, Ch. 488).
[7/] Assembly Bill (AB) 32, § 38505(m), §§ 38560 - 38574 (2006, Ch. 488); See also, U.S. Constitution Article I, Section 8, and Amendment X.

expected that the carbon intensity of the added imports will be substantially greater than the emissions of marginal in-state generation as long as new coal plants are not built.

10. Given existing procurement oversight and the prospect for a regional or federal GHG program in the foreseeable future, how extensive do you expect the threat to be of a longer-term shift of production to regions beyond the reach of a California source-based cap-and-trade regime?

Response: Given existing procurement oversight, SDG&E does not see a longer-term shift to higher GHG imports by California IOUs. However, under a purely source-based system, SDG&E would expect a shift in the use of higher GHG-emitting out-of-state power for ESPs and CCAs if direct access is re-instituted. CCAs and ESPs could be expected to rely on imports of low cost, high emitting fossil fuels that avoid the GHG cost to obtain a price advantage over IOUs. Also, SDG&E would not expect to see a reduction in emissions attributable to out-of-state generation and purchases of electricity by publicly-owned utilities (POUs). Out-of-state power would be lower cost compared to in-state power and so would provide incentives for maintaining existing out-of-state high GHG generation. The longer-term impact is mitigated by the California GHG Emission Performance Standard (EPS) and would be further mitigated by the prospect of a regional or national program if the allowances were allocated based on output (sales) or were auctioned.

11. If emissions associated with imported power are excluded from a cap-and-trade program, what policies beyond the existing suite of program including energy efficiency, California Solar Initiative, RPS, and Emission Performance Standard (EPS) do you recommend that California employ to achieve the necessary reductions from the electricity sector?

Response: A source-based system must be supplemented to comply with AB 32. Out-of-state resources could be covered under a "First Seller" or load based program design as discussed elsewhere in these comments. The minimum approach would be some type of monitoring of long-term contracts through the EPS and monitoring of LSE purchases of unspecified power or the import content of unspecified power and assignment of an appropriate level of GHG compliance obligation to that power.

12. As the Public Utilities Commission does not currently have authority to oversee all energy efficiency and renewable procurement programs for all kinds of retail providers (investor owned utilities (IOUs), community choice aggregators (CCAs), electric service providers (ESPs), and publicly owned utilities (POUs)), which agency(ies) should fill in any gaps? Which agency should be responsible for overseeing energy efficiency and renewable procurement for POUs? Would the California Air Resources Board (ARB) have the authority to require certain energy efficiency and renewable targets be met by POUs?

Response: The CEC currently monitors and reports on POU energy efficiency and renewables procurement. The POU governing boards have the only direct enforcement authority. The ARB can indirectly influence POU actions through the structure of the cap-and-trade program. For example, just as allocating allowances on an output basis (emissions per MWh) would maximize POU incentives to reduce emissions, auctioning allowances to sources under a purely source-based program would provide an incentive for POUs to undertake energy efficiency and renewables procurement to minimize their commodity costs. The ARB could also directly impact POU actions regarding the acquisition of renewables by adopting statewide RPS standards for AB 32 compliance, or adopting RPS standards as an alternate compliance mechanism for a market trading program. It is not clear that ARB can directly influence energy efficiency since standards would be hard to specify given varying local building standards and climates throughout California.

13. What sources would a source-based system cover? Could it cover California utility-owned facilities located outside of California?

Response: Operations of California utility-owned facilities located outside of the state can be controlled through orders made by the Commission to those utility-owners that are within the Commission's jurisdictional authority. Sources that are not owned by entities subject to California jurisdictional authority could not be controlled by California law or regulation under a source-based program.

14. Would a strengthened EPS assist in reducing emissions due to California imports? What recommended changes would you make to the EPS?

Response: No. The EPS is currently adequate to avoid long-term increases in GHG emissions due to imports by prohibiting long-term contracts with high-emitting resources. It is not likely that EPS could be altered to deal with short-term, unspecified imported power.

Deliverer/First Seller

The term "deliverer/first seller" generally refers to the entity that first delivers or sells electricity into the electricity grid in California. For generation within California, the deliverer/first seller (the regulated entity) would be the generator, similar to a source-based system. For imported power, the deliverer/first seller would be the entity that delivers the electricity into the California grid (the first sale within California), which could be a retail provider (an IOU, POU, ESP, or CCA) or wholesale marketer.

15. Please comment on the "First Seller Design Description" paper, which is Attachment A to this ruling. Does the paper accurately describe the deliverer/first seller program? If not, describe your concerns and include an accurate description from your perspective.

Response: The paper accurately describes the first seller approach, but it makes a number of faulty statements in comparing the first seller approach to a load based approach. The following are inaccurate representations:

- Page 2 and page 11 – "Using contract information to assign carbon content to imported energy is more challenging under the First Seller Approach, since the points of regulation for imports constitutes a larger set of entities with much more diverse business interests." The same type contract information would be used under either a First Seller or a Load based approach; there is nothing that makes First Seller more "challenging" as long as the required parties report the information.
- Page 6 – "For in-state generators, emissions data would be collected in the same way as has been proposed for Load-based methods." This statement is incorrect for the load-based approach. Under the load-based approach, all purchases of unspecified power, including power generated in California, are assigned a default rate value under current reporting protocols. The use of generator data is a significant advantage for the First Seller approach over the Load based approach with current GHG tracking systems.
- Page 8 – "For in-state generation, identifying carbon emissions should be straightforward".... While this statement is true for the First Seller approach, it is not true for the Load Based approach under existing reporting protocols for unspecified power purchased bilaterally or through MRTU markets, because this generation would be assigned a default value under current reporting protocols. Absent a change in reporting protocols, the use of generator data is a significant advantage for the First Seller approach over the Load based approach.
- Page 12 and 13 – "..., if the assignment of carbon is on a more granular level than the scheduling point or region and if the source of power is not known when offers are submitted to the DA or RT auctions, then bidders will not be able to include carbon costs in their energy offers to CAISO." Obviously, first sellers who generate the power for sale will know the location. And first sellers who purchase power on prior days would know where they purchased the power and would have an e-tag from that earlier purchase. The only first sellers without adequate information to include carbon into their offers would be first sellers making intraday trades. And if that information was valuable, it is likely that requisite information may become available. The conclusions of the paper at page 13 regarding adverse consequences on the CAISO energy market related to the First Seller approach are overstated.

Source-based for In-state Generation, Load-based for Imports

Under this approach, the point of regulation would be the electricity generators for in-state generation and the retail providers for imported power.

16. Please describe in detail your view of how this option would work.

Response: Under this approach, generation plants within California would bear the responsibility to hold sufficient emissions allowances to cover their actual emissions. Likewise, generation plants outside California that are majority-owned by California IOUs and POUs would bear the responsibility to hold sufficient emissions allowances to cover their actual emissions. The generation facilities could meet their obligation by purchasing allowances in an auction, through allowance trading in a multi-sector cap-and-trade program, or using other approved flexible compliance mechanisms. Imported power, other than power from majority-owned IOU and POU plants, would not be regulated directly. Instead, LSEs would bear responsibility to acquire allowances from an auction, allowance trading, or acquiring offsets to cover emissions from its imported power, other than power from its majority-owned plants. Imported power purchased bilaterally from a known source or from minority owned-plant would have an assigned emissions rate based on the source of the power. Imported power purchased bilaterally from an unknown source would have emissions assigned based on the e-tag source (whether a specific plant or a control area) unless a better tracking system is put in place. Imported power sold into MRTU markets or resold bilaterally within California would have emissions aggregated based on e-tag information allocated to LSEs on the basis of LSE purchases on a monthly basis.

17. Do you support such an approach? Why or why not?

Response: SDG&E could support such a system if the First Seller approach is determined to be legally infeasible. It has the same benefits as the First Seller approach of being able to facilitate a transition to a regional or national GHG reduction program. And like the First Seller approach, there is a more accurate accounting of GHG emissions for electricity generated in-state. The major problem with the approach is similar to the Load based approach under current reporting protocols - its impact on CAISO markets. While in-state sellers would have to include the cost of the GHG allowances into their bids into the CAISO market, importers would not. This approach would create a price advantage for importers, leading to increased imports into the CAISO markets. The increased imports would increase the use of scarce transmission resources and potentially crowd out some renewable power. It would also raise costs for California LSE customers since they would pay the market price plus the cost of purchasing required allowances. As a result, such a structure would discourage LSEs from purchasing power through the CAISO DA and RT markets, and instead try to purchase power bilaterally from specified sources, so as to lower their GHG-related costs.

18. Does this approach have legal issues associated with it? Provide a detailed analysis and legal citations.

Response: The source-based for in-state generation, load-based for imports approach does not facially suffer from the same AB 32 jurisdictional infirmities associated with the First-Seller and many of the other type and point of regulation approaches posed by the ALJ Ruling, but this approach also does not lend itself well to absolute legal conclusion regarding preemption under the Federal Power Act. Structurally and conceptually it may be subject to preemption to some degree, and the danger of interference with the federal

regulatory scheme arise where, as here, regulatory compliance measures are unmistakably and unambiguously directed at purchasers who take electric energy in California after transportation in interstate commerce. This approach may even be fundamentally unworkable because of a clear federal prohibition on the enforcement of state jurisdiction over interstate transmission of electric energy. The Federal Power Act (16 U.S.C.A. § 791 et seq., "FPA") grants the Federal Energy Regulatory Commission ("FERC") exclusive jurisdiction over the wholesale energy market; therefore, any exception based on traditional state police power of the State, or state board, must be strictly construed.

Based on a general interchangeability of case precedent between the Federal Power Act and the Natural Gas Act, dictum in *Northern Natural Gas,* suggests that the states may not be barred entirely from exercising at least some control over interstate purchasers. In particular, the Court left open the possibility that the states might validly impose regulations, presumably subject to the restriction that there is only *de minimis* interference with the interstate market.[8/] The Court specifically referred to the "availability of regulatory alternatives, *particularly in the form of proration* and similar orders *directed at producers.*"[9/] When applied to the source-based for in-state generation, load-based for imports approach this language indicates that a scheme to conserve the environment, if narrowly tailored, might be considered a valid exercise of state police power.[10/]

However, because the *Northern Natural Gas* majority chose to frame the issue of the case broadly, no attempt was made to measure the actual extent of interference with the federal goals. Rather, the Court made broad, speculative statements that were unsupported by particularized findings.[11/] Hence, the outcome of a case brought in federal court to challenge a source-based for in-state generation, load-based for imports approach is not absolute and may revive the measure of interference issue under a modified preemption analysis under strict scrutiny.

19. If retail providers are responsible for internalizing the cost of carbon for imported power, all power generated in-state may need to be tracked to load to avoid double regulation of in-state power. Do you agree?

8/ *372 U.S. at 94 n.12.*

9/ *Id. at 94 n.12* (emphasis added). *But see id. at 104* (Harlan, J., dissenting) ("[T]he most direct interference with the availability of gas for interstate sale is the 'allowable' order.").

10/ The FERC apparently agrees that preemption depends on whether state actions are valid exercises of state police power. But the FERC continues to assert broad jurisdictional powers over the interstate wholesale energy market and cites the authority of the FPA. The FERC in Order 888, 61 Fed Reg 21540 (May 10, 1996), continues to argue that "pervasive and exclusive" federal occupation of the area preempts state regulation.

11/ "[A]ny readjustment of purchasing patterns which such orders *might* repair . . . *could* seriously impair" the federal regulation of the industry, *id. at 92* (emphasis added); "[t]he *prospect* of interference," *id.* (emphasis added); "though collision between the state and federal regulation *may not be an inevitable consequence,* there lurks such an imminent *possibility," id.* (emphasis added).

Response: No. The amount of imports would be known after the fact. For those not accounted for directly, the residual could be allocated proportionally to LSEs based on purchases of unspecified power within California, bilaterally and through CAISO markets.

20. If that is the case, does a mixed source-based/load-based approach offer any advantages compared to a load-based approach in terms of simplifying reporting and tracking? What if the load-based system uses TEACs? How could imports be differentiated from in-state generation in a way that reduces the complexity of reporting and tracking compared to a load-based approach?

Response: Like the First Seller approach, the emissions of generation in California would be more accurately tracked in this approach. Imports in this approach that were not direct purchases, but part of California unspecified power would be allocated after the fact and assigned an average factor based on the composition of the imports or a default factor. Unlike First Seller, the point of regulation would be the retail providers for imported power and so effectively maintains the monitoring boundary safely inside California's geographic borders and downstream of the first in-state purchaser's contract nexus with the importer.

Deferral of a Market-based Cap-and-Trade System

In this scenario, a California-only cap-and-trade system would not be implemented for the electricity sector at this time. Instead, California would work with other Western states to develop a Western Climate Initiative cap-and-trade system and/or work toward a national cap-and-trade program. In the meantime, existing policies and programs in the electricity sector may need to be ramped up to meet the AB 32 goals. Several variations of this option may be possible. For example, a load-based cap could still be developed for retail providers, with assignment of individual entity obligations and trading available within the California electricity sector only, but not with other sectors. A second alternative would be to develop individual entity caps (or carbon budgets) which entities could not exceed without facing penalties or fees, but not allow for any trading of allowances at this time. Another option would be to ramp up the mandatory levels of existing programs such as the energy efficiency and RPS programs to higher goals, and make all retail providers obligated to meet these additional goals, without assigning specific cap levels to individual entities.

21. How important is it that a cap-and-trade system be included in the near-term as part of the electricity sector's AB 32 compliance strategy?

Response: A market-based system will provide the least-cost approach to reducing GHG emissions given the diversity of emission-reduction opportunities available over a wide sectoral and geographic area. A deferral of a market-based cap-and-trade to a regional or national system is reasonable given the heightened sensitivity to GHG regionally and nationally. There is now a realistic expectation of such cap-and-trade markets emerging in the near term. SDG&E's concern is that command and control regulations put into

place in lieu of a market-based system to implement AB 32 could effectively prohibit California from participating in a regional or national market and this outcome should be avoided. For example, if the command and control regulations are so prescriptive that they would not allow for any other actions other than the prescribed actions, participation in a regional or national market would not provide any benefits in terms of lowering compliance costs. While the emissions price mechanism would provide incentive to regulated entities to select the most efficient options to reduce emissions, the in-place command-and-control regulations would prevent such actions. In addition, to the extent that GHG reduction activities have been mandated by regulation, they may not get credit in any national market that may be developed, depriving California ratepayers of the value of the efforts that they have funded to generate the GHG emission reductions.

22. Would your answer to Q12 be different if there is no market-based cap-and-trade system? If so, please explain.

Response: Yes, a market-based system is preferred. It will provide the least-cost approach to reducing GHG emissions given the diversity of emission-reduction opportunities available over a wide sectoral and geographic area. Command and control regulations put in place as a long-term solution in place of a market-based system will be inefficient. Transitional command and control regulations coupled with flexible compliance mechanisms put in place in anticipation of developing a larger cap-and-trade market in the future could be an efficient way to expand the magnitude of GHG reductions, and relieve California of the leakage, tracking, and electricity market distortions that are inherent problems in a California-only market.

23. Address the following:

- *How emission reduction obligations could be met if there is no cap-and-trade system for the electricity sector,*
- *How increased programmatic goals would impact rates, and*
- *How deferral of a cap-and-trade program for the electricity sector would facilitate or hinder California's integration into a subsequent regional or federal program.*

Response: In the GHG modeling effort done by CPUC consultants, all reductions are based on increased acquisition of renewables, increased energy efficiency, and acquisition of low emitting resources. These are part of the loading order described in the Energy Action Plan. SDG&E assumes that California would continue on its current path of ramping up those efforts over time in response to a lowered GHG cap or direct regulations. The GHG modeling effort undertaken by the CPUC will eventually provide information on the impact on rates of programmatic goals.

Because of the differences in marginal compliance costs across entities, the pure programmatic approach will be more costly than a program that includes trading.

24. How deferral of a cap-and-trade program for the electricity sector would facilitate or hinder California's integration into a subsequent regional or federal program.

Response: Deferral of a cap-and-trade would facilitate California's integration into a regional or national program if 1) the adopted command and control regulations would be superseded by the regional or national program (that is, the mandates would be eliminated upon implementation of the regional or national program), and/or if 2) the deferred cap-and-trade program was load-based (since almost all proposals for a regional or national program are source based).

Deferral of a cap-and-trade program would hinder California's integration into a regional or national program if 1) the adopted command and control regulations would remain in place in spite of the regional or national cap-and-trade program, and/or if 2) the deferred cap-and-trade program was the first seller approach since it would provide parties with familiarity with trading. If the command and control regime remains in place, it would likely deprive California ratepayers of any credit in a Federal program because activities were pursued pursuant to a regulatory mandate.

As noted above, a California-only program could strand investment made by California ratepayers if the investments are later treated as non-creditable early actions. There is risk both with trading programs not smoothly integrated with future regional or federal programs and with mandatory reduction programs that depend on the characteristics of the adopted program.

25. If neither a regional system nor a national system is implemented within a reasonable timeframe, should California proceed with implementing its own cap-and-trade system for the electricity sector? If so, how long should California wait for other systems to develop before acting alone?

Response: No, California should not proceed with implementing its own cap-and-trade system for the electricity sector only. A market-based system will provide the least-cost approach to reducing GHG emissions if there is a diversity of emission-reduction opportunities available. An electric sector only cap-and-trade program for California is neither diverse in technologies nor in geography. An electric sector alone cap-and-trade program also could have significant market power issues, especially under a Load based system as was pointed out by SDG&E in R.04-04-003. The Commission also recognized the problem of market power if there was an auction of allowances under a load-based approach in Finding of Fact 26 in D.06-02-032. While mitigation measures can be adopted, it is preferable that a cap-and-trade program should be multi-sector and/or regional to provide a diversity of emission reduction opportunities.

26. What flexible compliance mechanisms could be integrated into a non-market based GHG emission reduction approach?

Response: The creation and use of offsets within California, creation and use of offsets outside of California, and flexible compliance periods.

27. If a market-based cap-and-trade system is not implemented for the electricity sector in 2012, how would you recommend addressing early actions that entities may have undertaken in anticipation of a market?

Response: Reductions that result from early actions should be eligible for credit under any cap and trade program that may ultimately be adopted. In the event that a market is not adopted, early action should be credited through reduced future compliance obligation via establishing baselines prior to passage of AB32.

Recommendation and Comparison of Alternatives

28. Submit your comprehensive proposal for the approach California should utilize regarding the point of regulation and whether California should implement a cap-and-trade program at this time for the electricity sector. If you recommend that another approach be considered besides those detailed above, propose it here. If you recommend one of the above options, give as detailed a discussion as possible of how the approach would work.

Response: SDG&E supports the first seller approach that has been the subject of two rounds of comments, a workshop, and an *en banc* hearing before the Commission provided there are no greater relative risks of this approach being delayed or overturned in court.

29. Address and compare how each of the alternatives identified in the above questions, and the proposal you submit in response to the preceding question, would perform relative to each of the principles or objectives listed above and any other principles or objectives you propose. For each alternative, address important tradeoffs among the principles.

Response: From its earliest comments, SDG&E has supported a market-based approach which is developed or put into place over as wide a sectoral and geographic area as possible and by way of the least-cost approach to reducing GHG emissions, while recognizing climate change is a global problem. SDG&E believes the First Seller approach in the electric sector may be the most compatible implementation of AB 32 with a regional and/or national trading program. However, the state must thoroughly evaluate GHG program feasibility and continue to stay focused on federal actions so that any program introduce in California lacks any compatibility issues with a regional and/or national approach.

III.
CONCLUSION

For the reasons set forth herein, the Commission should adopt type and point of regulation in accordance with the above comments of SDG&E and SoCalGas and that

allows the State to facilitate achievement of the maximum legally feasible and cost-effective GHG reduction rules, regulations, programs, mechanisms, and incentives under its jurisdiction, while maximizing integration to regional, national, and international GHG reduction programs.

Respectfully submitted this 3rd day of December, 2007.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 M) AND SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) ON ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING COMMENTS ON TYPE AND POINT OF REGULATION 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 and Jonathan Lakritz.

Executed this 3rd day of December 2007 at San Diego, California.

/s/ Susan A. Long
Susan A. Long

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