

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

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Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies))))	Rulemaking 06-04-009 (Filed April 13, 2006)
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**COMMENTS OF MORGAN STANLEY CAPITAL GROUP INC.
ON THE ADMINISTRATIVE LAW JUDGES' RULING REQUESTING COMMENTS
ON TYPE AND POINT OF REGULATION ISSUES**

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I. INTRODUCTION

Pursuant to the November 9, 2007 ruling of Administrative Law Judges Charlotte F. TerKeust and Jonathan Lakritz, Morgan Stanley Capital Group Inc. ("MSCG") respectfully submits its comments on the type and point of regulation for the electricity sector to reduce greenhouse gas ("GHG") emissions in California.¹

II. COMMENTS

As noted by MSCG at Commission-sponsored symposia and in comments filed with the California Public Utilities Commission, the California Energy Commission, and the California Air Resources Board, MSCG believes that a source-based approach to cap-and-trade in California is superior, from both a policy and legal perspective, to either a load-based or first-seller approach.² MSCG reiterates its support for a source-based market construct and reserves its right to further comment in this proceeding on market design issues in support thereof.

¹ Administrative Law Judges' Ruling Requesting Comments on Type and Point of Regulation Issues, Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies (Docket No. R.06-04-009) (issued Nov. 9, 2007).

² See, e.g., Load-Based v. Source-Based Systems, presented by MSCG at the Commission's *Greenhouse Gas Cap and Trade Systems: Symposium on Linking* (Apr. 19, 2007), available at <http://www.cpuc.ca.gov/static/Energy/Electric/climate+change/oliviahartridge.ppt>; Comments of Morgan Stanley Capital Group Inc. on Joint California Public Utilities Commission and California Energy Commission Staff Proposal for an Electric Retail Provider GHG Reporting Protocol (filed with the CPUC and CEC in this proceeding on July 2, 2007); Comments of Morgan Stanley Capital Group in Response to Recommendations of the Market Advisory Board to the California Air Resources Board (filed with CARB June 1, 2007).

A. General

Q1. What do you view as the incremental benefits of a market-based system for GHG compliance, in the current California context?

See response to Q2, below.

Q2. 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?

A market-based system for GHG compliance would deliver to California the statutorily mandated reduction in GHG emissions at the least overall cost to end users and would be best equipped to ensure compliance. This will occur primarily because a market-based system will allow market participants to consider all possible compliance options rather than just those that California has prejudged to be acceptable.

In support of its position, MSCG notes the following points. First, investment capital ultimately would flow to those ideas that prove to be most efficient and cost-effective. Capital that the market “wastes” on ideas that later prove to be ill-conceived cost consumers nothing. In comparison, capital invested only in technology that California deems appropriate based on limited information known today costs consumers in the form of lost opportunity in other solutions and investment in technology that may prove fruitless or sub-optimal.

Second, market-based approaches would lower the overall cost of achieving emissions reductions because they generally cost less to administer. Specifically, allowing the market freedom to choose solutions means that California does not have to monitor whether market participants use specific technologies. Under a market approach, California’s only concern would be that the market has identified solutions that help California meet its GHG emissions reduction goals. How the market achieves this goal becomes less relevant. Market-based approaches also

are less complex than command and control approaches, and are therefore less complex to administer.

B. Principles or Objectives to be Considered in Evaluating Design Options

Q3. 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.

Although MSCG agrees that these criteria are important, it does not necessarily agree with the Commission's descriptions of each criterion. For example, with respect to "Goal Attainment," the ruling asks whether "the approach would have any advantages to promoting energy efficiency, combined heat and power, or renewable energy." This is an inappropriate question because it singles out specific technologies for special treatment and is potentially antithetical to another criterion, "cost minimization." Simply stated, if California encourages investment in any particular technology or technologies and those choices are different than those the market would have made, then those choices will result in incremental costs that provide no incremental reduction in GHG emissions. Moreover, those incremental costs will accrue to end users, which would not have occurred if the market had selected the technologies in which to invest.

MSCG also disagrees with the Commission's description of "Environmental Integrity." The Commission defines this criterion in terms of a vexing, but essentially insoluble problem (*e.g.*, contract shuffling and leakage in a non-closed system), which is not constructive. MSCG would amend the criterion to read as follows: "Compliance instruments accurately reflect the amount of emission they purport to represent. Emissions measured or assigned to a point of regulation accurately reflect the GHGs for which that entity is responsible for emitting. Physical measurements are accurate." MSCG's proposed revision better focuses on the end goal and inherently addresses problems such as leakage or shuffling.

Finally, MSCG suggests adding a criterion: “Interoperability with existing and future GHG regulation systems.” If California allows market participants to use allowances and offsets from other jurisdictions, it would provide a crucial price and volume safety valve for situations that would otherwise require loosening of the caps, and result in backsliding on the State’s goal of accounting for and reducing actual emissions.

C. Load-Based Cap-and-Trade System Design

- Q4. 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.**

No response provided.

- Q5. 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?**

No response provided.

- Q6. 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?**

No response provided.

- Q7. 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?**

No response provided.

D. Source-based Cap-and-trade System Design Options

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

Q8. Do you view this approach as compliant with Assembly Bill (AB) 32? Please support your answer.

See response to Q10, below.

Q9. 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.)?

See response to Q10, below.

Q10. 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?

One can view the threat of leakage over two time horizons: short-term and long-term. In addition, three factors would drive substitution of high-emitting out-of-State resources for low-emitting in-State resources.

First is the capacity factor of existing resources. MSCG has not conducted an analysis of current capacity factors. However, the comments and reports of other parties in this proceeding suggest that high-emitting resources have little spare capacity, which would allow only for minimal short-term switching.

Second, the construction of incremental high-emitting generation capacity could lead to significant opportunities for substitution in the long-term. A variety of market participants have proposed such projects both in nearby states that would connect to the existing grid and in more remote states and provinces that would build long-distance DC power lines to bring coal-fired generation to populous coastal regions. MSCG does not wish to speculate on the likelihood of any

of these proposals being approved and constructed, but notes that the trade press reports the issues, problems, and success rates on a regular basis.

The third factor that influences substitution possibilities is import transmission capacity. The maximum amount of substitution is limited to the maximum amount of available import transmission capacity. California would have to adjust downwardly the available import transmission capacity for the amount that the State already utilizes for bringing high-emitting resources into the State. It also would need to adjust downwardly the amount of import capacity for external congestion issues, such as the fact that some low-emitting units might not be displaceable by high-emitting units for reasons having to do with their location relative to transmission bottlenecks. Conversely, some proposed projects (*e.g.*, the various DC lines from remote locations) come with their own self-contained increases in transmission import capacity.

In summary, MSCG's initial (albeit unscientific) analysis suggests: (1) short-term substitution potential would be minimal to moderate; and (2) mid- to long-term substitution potential seems very high, and the economic justification for such substitution likely exists. However, the degree to which California realizes such economic potential depends upon the outcome of a large number of major generation siting decisions pending before multiple jurisdictions, and the practical difficulties are likely to be great. MCSG has no special insight into how these factors will be resolved, but believes the actual degree of substitution is likely to be much less than that which could be supported by economic considerations alone.

Q11. 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?

No response provided.

Q12. 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?

No response provided.

Q13. What sources would a source-based system cover? Could it cover California utility-owned facilities located outside of California?

No response provided.

Q14. Would a strengthened EPS assist in reducing emissions due to California imports? What recommended changes would you make to the EPS?

No response provided.

2. *Deliverer/First Seller.*

Q15. 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.

MSCG believes the First Seller Design Description (“FSDD”) describes adequately the issues and trade-offs inherent to a first-seller system. However, the FSDD states that a first-seller approach would be more complex to administer than a load-based model because California would be responsible for regulating more entities.³ MSCG does not challenge the statement that more entities would be regulated, but believes there are other reasons why a load-based approach would be more administratively complex than a first-seller system. For example, under a load-based paradigm, California would have to address which entities are responsible for emissions allocations and submissions arising from the CAISO’s dispatch decisions. This issue disappears

³ See FSDD at 4-5.

under a source-based or first-seller paradigm. The FSDD fails to weigh these competing issues when reaching a conclusion as to the “net” complexity of one approach versus the other.

The FSDD also fails to discuss the possibility that the different approaches may shift complexity from one entity to another, rather than eliminate the problem in its entirety. For example, under a load-based approach, a load-serving entity would gather and track emissions data from its supply sources rather than having a regulatory body track emissions directly from first-sellers, but the administrative burden associated with a tracking requirement would still exist as part of California’s GHG program as a whole. Thus, MSCG does not believe the evidence presented in the FSDD supports a conclusion that the net administrative complexity of the first-seller approach is higher than the load-based approach.

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

Q16. Please describe in detail your view of how this option would work.

No response provided.

Q17. Do you support such an approach? Why or why not?

No response provided.

Q18. Does this approach have legal issues associated with it? Provide a detailed analysis and legal citations.

No response provided.

Q19. 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?

No response provided.

Q20. 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?

No response provided.

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

Q21. 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?

For the reasons stated previously by MSCG throughout this proceeding, MSCG believes a cap-and-trade system is the best approach to GHG reduction. In addition, it is not administratively efficient to implement one system as an interim measure, and to replace it shortly thereafter with another. This is especially true when the initial system would be more complex, and the subsequent system easier, to administer. If the initial stage of the program were simpler, and the end-stage more complex, MSCG might agree that a phase-in is the best approach. However, this does not appear to be the case.

Q22. Would your answer to Q12 be different if there is no market-based cap-and-trade system? If so, please explain.

No response provided.

Q23. 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.**

No response provided.

Q24. 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.

No response provided.

Q25. 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?

No response provided.

Q26. What flexible compliance mechanisms could be integrated into a non-market based GHG emission reduction approach?

No response provided.

Q27. 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?

No response provided.

E. Recommendation and Comparison of Alternatives

Q28. 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.

See response to Q29, below.

Q29. 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.

MSCG continues to support in California – as it has in jurisdictions throughout the world – regulation of GHG emissions through a cap-and-trade system. The single most important reason

for this relates to the Commission's first suggested criterion in Section 3.2: minimizing the total cost to society of achieving a given GHG reduction target. The ability of a cap-and-trade system to harness the ingenuity of the market to identify the best ways to meet the goal is paramount.

For the electricity sector, a source-based approach for in-state resources is necessary to ensure that dispatch decisions reflect the price signal for GHG emissions. This, in turn, will provide market participants with incentives to alter behavior. Accordingly, California should distribute allowances through auctions in order to ensure an immediately viable secondary market, to provide clear price signals for both short- and long-term investment decision making, and to ensure that all entities that require allowances have equal opportunities to acquire them at equal prices. Moreover, the State should channel Auction Revenue Rights derived from auctions to individual consumers of all customer classes to offset the costs of emissions reduction.

AB 32 imposed upon California's regulators the Herculean task of requiring the State to account for emissions associated with imports. A "zero sum" regulation is impossible to impose on an open system where not all of the essential components are subject to the same regulatory criteria. The record in this proceeding demonstrates that several administrative approaches are available for California to assign emissions responsibility to imported power. However, each approach is only an administrative approximation and is vulnerable to leakage and contract shuffling. The challenges for dealing with imports are essentially the same for each of the proposed regulatory structures and the flaws of each approach are roughly equivalent. However, the first-seller approach for dealing with imports is the most consistent with a source-based approach for in-state resources, and is therefore superior to the others.

III. CONCLUSION

MSCG respectfully requests that the two commissions consider the foregoing comments when making their recommendation on the type and point of regulation for the electricity sector to the CARB.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Comments of Morgan Stanley Capital Group Inc. on the Administrative Law Judges' Ruling Requesting Comments on Type and Point Regulation Issues on all of parties of record in R. 06-04-009 by electronic mail and by U.S. mail to those parties that have not provided an electronic address to the Commission. I also have sent hard copies by overnight mail to the assigned Commissioner, Michael R. Peevy, and the assigned Administrative Law Judges, Charlotte F. TerKeurst, Jonathan Lakritz, and Meg Gottstein.

Moreover, pursuant to the October 15, 2007 Administrative Law Judge's Ruling Requesting Comments and Noticing Workshop on Allowance Allocation Issues issued in R. 06-04-009, I have sent one hard copy of these comments by overnight mail to the California Energy Commission and have sent electronic copies of these comments to docket@energy.state.ca.us and to kgriffin@energy.state.ca.us.

Dated at Washington, DC, this 3rd day of December, 2007.

/s/

Adam J. Katz

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