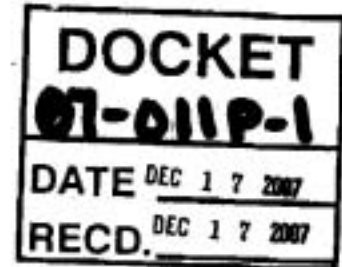


**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

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

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



**REPLY COMMENTS OF CALPINE CORPORATION ON  
TYPE AND POINT OF REGULATION ISSUES**

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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
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Order Instituting Rulemaking to Implement the )  
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R.06-04-009  
(Filed April 13, 2006)

**REPLY COMMENTS OF CALPINE CORPORATION ON  
TYPE AND POINT OF REGULATION ISSUES**

Pursuant to the November 9, 2007 ruling of Administrative Law Judges TerKeurst and Lakritz ("November 9 ALJ Ruling"), Calpine Corporation ("Calpine") submits this reply to comments on type and point of regulation issues for the reduction of greenhouse gas ("GHG") emissions from the electricity sector. Specifically, Calpine replies to comments that (1) assert that a cap-and-trade program should not be a high priority for California in the near-term; (2) have not placed sufficient importance on the "expandability" of a state-based system; (3) propose emission reduction systems that are fundamentally incompatible with wholesale electricity markets; and (4) incorrectly characterize the ability of a deliverer/first-seller approach to accurately track imports.

**I. INTRODUCTION**

As Calpine discussed in its opening comments, in establishing emission targets for California, Assembly Bill ("AB") 32 contemplates the State taking a leadership role with respect to GHG reduction measures and set an example for other states, and the nation, to follow.<sup>1</sup> Consistent with this aspect of AB 32, California has, to date, assumed such a leadership role. Recent signals, however, suggest that the State is, at least, considering deferring implementation

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<sup>1</sup> Calpine Comments at 2.

of a cap-and-trade system because of perceived challenges associated with a single-state (*i.e.*, California-only) program and the expectation that a regional or national system is forth-coming.

While Calpine is optimistic that the Western Climate Initiative process is moving forward and expects regional and federal source-based emission trading systems to ultimately be developed, it does not advocate California delaying the development and implementation of a California-only, state-based cap-and-trade system. On the contrary, Calpine believes that, given the early stages of regional and federal initiatives, it is even more imperative that California move forward with a market-based solution for reducing GHG emissions. Specifically, the Commission should – *in this proceeding* – issue a decision which articulates its strong support for a deliverer/first-seller cap-and-trade program for meeting the emission reduction goals of AB 32 and further provide the Air Resources Board (“ARB”) with specific design recommendations for implementing such a program.

If the Commission does not take action now to develop a market-based, cap-and-trade approach for meeting emission reduction goals, it may jeopardize the State’s ability to meet its emission reduction goals for the electricity sector on schedule. Moreover, and equally important over the long-term, it will be missing a critical opportunity to provide the kind of bold national leadership contemplated by AB 32 and quite possibly find itself, and the State, with a diminished voice as regional and national programs are designed. Accordingly, for the reasons stated herein, and in Calpine’s opening comments, the Commission should adopt a deliverer/first-seller cap-and-trade program for the electricity sector. By doing this, the Commission will continue to advance California’s emission reduction objectives in a manner consistent with the expected development of a regional and/or federal source-based system.

## **II. A CAP-AND-TRADE SYSTEM IS ESSENTIAL TO ENSURE THAT EMISSION REDUCTIONS ARE REALIZED IN THE MOST COST EFFECTIVE WAY**

Most parties in this proceeding agree with Calpine that the Commission should move forward with a deliverer/first-seller based cap-and-trade program for the electricity sector.<sup>2</sup> A few parties, however, assert that adoption of a cap-and-trade system is not necessary to reduce GHG emissions.<sup>3</sup> For example, LADWP suggests that an emission trading system should be a secondary objective to setting an overall cap on GHG emissions.<sup>4</sup> The Commission should reject proposals that would set a cap on GHG emissions without also providing a market mechanism for trading emission allowances.

As Calpine discussed in its opening comments, experience with the Acid Rain program demonstrates that cap-and-trade systems result in emission reductions being achieved at a much lower cost relative to other regulatory approaches. Moreover, the ability to buy and sell allowances rewards innovation and provides economic incentives that encourage “over-compliance.”<sup>5</sup> Calpine strongly believes that the emission reduction goals of AB 32 can only be met if innovation is encouraged, new technologies are developed, and existing low-emitting resources are fully utilized. Because a cap-and-trade system does not rely on a specific compliance path or specific technologies, it is much more likely to advance and reward needed innovation. The net effect is that the amount of emission reductions realized is much greater than the reductions that could be expected under traditional - command and control – regulatory approaches.

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<sup>2</sup> See e.g., Comments filed by Constellation Newenergy, Inc. et. al., Pacific Gas and Electric Company, San Diego Gas & Electric Company/Southern California Gas Company, Environmental Defense, AReM, Southern California Edison Company, Western Power Trading Forum.

<sup>3</sup> See Northern California Power Authority Comments at 5; Southern California Public Power Authority (“SCPPA”) Comments at 9; Los Angeles Department of Water and Power (“LADWP”) Comments at 3.

<sup>4</sup> LADWP Comments at 25-26.

<sup>5</sup> Calpine Comments at 3.

In contrast, if an emissions cap without allowance trading is applied to sources, it would competitively disadvantage California generation relative to out-of-state generators. This would be the case because out-of-state generators would not face the same GHG compliance costs as in-state generators. Because compliance costs would serve to increase wholesale prices for in-state generation, such an approach would likely increase California's use of imported power. Increasing the use of imported power that would not be subject to emission reduction requirements is simply inconsistent with the goals of AB 32.

Irrespective of whether a regional or national source-based system is implemented in the future, the price signals that would be sent to the market under a cap-and-trade system are essential to the development of the new technologies that will be necessary if emission reduction goals are to be met. Accordingly, the Commission should move forward with the development of a deliverer/first-seller based cap-and-trade program for the electricity sector. By doing so, the Commission will best ensure reductions in GHG emissions in the State and, at the same time, establish a system that will be compatible with a future cap-and-trade system likely to be adopted on a regional or national level.

### **III. EXPANDABILITY WILL BE CRITICAL TO THE SUCCESS OF AB 32**

As Calpine discussed in its opening comments, "expandability"<sup>6</sup> should be considered a primary objective in evaluating design options for an emission trading system. Specifically, Calpine believes it is critical to the success of California's emission reduction efforts that the trading system adopted by the Commission and ARB take into account an expected regional or federal source-based system – in other words, be "expandable." In contrast, SCPPA asserts there is no reason to believe that any particular type of system will be adopted on a regional or national

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<sup>6</sup> Calpine defines "expandability" as the potential for a California-only emission trading system to serve as the model for a regional or national system.

level.<sup>7</sup> Thus, SCPPA argues that the Commission and ARB should not attempt to “guess the type of program that other states or the U.S. Congress might favor and then design a program to match that guess.”<sup>8</sup>

Contrary to SCPPA’s position, the likely direction of future federal climate policy is fairly well known and can be reasonably predicted. To date, no climate change legislation has been introduced at the federal level that would result in a load-based system as defined by the Commission in this proceeding. Moreover, the only regional proposal going forward – the Regional Greenhouse Gas Initiative (RGGI) is a source-based system. While Calpine is not, *per se*, opposed to a load-based approach if certain provisions are included,<sup>9</sup> Calpine does not consider a load-based approach an appropriate system for California given the strong signals that a federal load-based system will not be adopted.

Moreover, a load-based California-only system would not be compatible with a regional or federal source-based system, nor could it be efficiently transitioned to such a source-based system as LADWP suggests.<sup>10</sup> For instance, because a regional or federal source-based system would regulate emissions at the generator, imposing a load-based system at the state level could result in emissions being regulated twice. Rather than dedicate limited resources to developing and implementing a load-based system that would, on its face, be incompatible with a regional or federal source-based system, the Commission should instead pursue a first-seller based cap-and-trade approach that would be more consistent with a future source-based systems.

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<sup>7</sup> SCPPA Comments at 13.

<sup>8</sup> SCPPA Comments at 13.

<sup>9</sup> See Calpine Comments at 5-7.

<sup>10</sup> See LADWP Comments at 3-4.

#### **IV. LOAD-BASED SYSTEMS THAT USE CONTRACT AND SETTLEMENT DATA TO ATTRIBUTE EMISSIONS ARE NOT COMPATIBLE WITH WHOLESALE MARKETS**

Most Parties, including those that support or prefer the adoption of a load-based approach, agree that it is critical that the allowance trading system adopted by the Commission be compatible with wholesale electricity markets and not impair grid reliability. Although Calpine strongly agrees with this objective, Calpine does not agree with the assertion by SCPPA that a load-based system that uses contract and settlement data to attribute emissions would “minimize disruption of the existing bilateral market for electricity.”<sup>11</sup> Accordingly, the Commission should reject SCPPA’s proposal for a load-based system.

SCPPA’s position that contract and settlement data should be used to attribute emissions demonstrates a fundamental misunderstanding of wholesale energy markets. GHG emission reduction measures will be most effective and (importantly) least disruptive to wholesale electricity markets if the price of GHG emissions is captured *at the generator level* and reflected in subsequent dispatch decisions as would be the case for in-state generation under a deliverer/first-seller approach. In contrast, under a load-based approach that uses contract and settlement data to attribute emissions for both in-state and out-of-state sources, the carbon price “signal” would not be directly conveyed to generators.<sup>12</sup> As a result, such a load-based approach would most likely bifurcate the wholesale market because clean generation sources would self-schedule and sell under contract, while higher emitting – dirty - sources would be left to participate in the California Independent System Operator (“CAISO”) markets.

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<sup>11</sup> SCPPA Comments at 17.

<sup>12</sup> While not Calpine’s preferred option, we recognize that a TEAC model for a load-based system would also provide a price signal to generators.

In its opinion regarding load-based and source-based trading systems, the CAISO Market Surveillance Committee explained the reason why the wholesale market would become bifurcated in such circumstances:

[A] load-based system, in which LSEs [load serving entities] must track, using a pre-specified administrative procedure, the emissions associated with all their energy transactions, will pose a grave danger to the efficiency and competitiveness of the California short-run markets. This is because LSEs participating in [CA]ISO markets will be buying power, and generators will sell power in the [CA]ISO markets based on some average or marginal emissions rate that is administratively determined. As a result, generation unit owners that can command a premium for their units in the bilateral market, because of the unit's low emissions, will selectively avoid providing bids to the [CA]ISO markets, leaving just the high emission generation units willing to accept the [CA]ISO prices, which would reflect average emissions. In this sense the "dirty" generation would chase out the "clean." Low emission sources will tend to self-schedule, in order to secure higher prices. Another reason why more self-scheduling is likely to occur is because each LSE will be trying to self-manage its supply portfolio to stay within their emissions limitation. Assuming that compliance will be based on actual output, as opposed to contracted supply, LSEs will seek to protect their portfolio from being re-dispatched in the [CA]ISO markets, by submitting self-schedules.<sup>13</sup>

Thus, instead of being compatible with wholesale markets, a load-based system that uses contract and settlement data to attribute emissions would threaten market efficiency and competitiveness.

**V. CRITICISM OF EMISSION TRACKING UNDER OF A DELIVERER/FIRST-SELLER APPROACH IS BASED ON A MISUNDERSTANDING OF THE APPROACH OR ON SPECIFIC DESIGN FEATURES THAT CAN BE EASILY ADDRESSED**

Several Parties, including SCPPA, the Division of Ratepayer Advocates, and the Energy Producers and Users Coalition ("EPUC") assert that a deliverer/first-seller approach is less accurate, and more administratively complex, than a load-based approach using contract and



settlement data to attribute emissions. Such assertions are based on a misunderstanding of the deliverer/first-seller approach, or on a selective reading of Attachment A to the November 9 ALJ Ruling (the “Resero Report”).

For instance, SCPPA presumes that e-tags would have to be used to assign emissions to imports under a deliverer/first-seller approach. While Calpine agrees that using e-tags to assign emissions would be problematic, it does not propose such an approach. Rather, Calpine believes that e-tags should be used solely to identify the entity responsible for importing power into California and *not* to assign a control-area, source, or emissions level to the power. Using e-tags to identify entities responsible for importing power should not be any more costly than a load-based system, as this information is already tracked and aggregated by balancing authorities to enable balancing services and settlement.

SCPPA also asserts that, because e-tags would not be generated for imports that do not cross a balancing authority boundary, they should not be relied upon to identify entities responsible for imported power.<sup>14</sup> However, as discussed in the Resero Report, this “problem” can be easily be fixed by requiring balancing authorities to report all imports and generation. Accordingly, using e-tags to identify entities importing power would not undermine the ability to track imports under a deliverer/first-seller approach.

In addition, SCPPA claims that “[t]he ability to use contracts and settlements data of a retail provider to identify the sources of energy derived from a third-party is a factor that makes a ‘load-based’ approach to point of regulation superior to the ‘first-seller’ approach.”<sup>15</sup> SCPPA’s position seems to be based on a statement made in the Resero Report that “[g]iven the diversity

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<sup>13</sup> Market Surveillance Committee of the California ISO, *Opinion on “Load-Based and Source-Based Trading of Carbon Dioxide in California”* November 27, 2007 at 7-8 (citation omitted).

<sup>14</sup> SCPPA Comments at 23-24.

<sup>15</sup> SCPPA at 16-17

of first-seller entities and first sellers transactions, it may be more challenging to assess the carbon content of import transactions by reviewing contracts under a first-seller approach [than] would be the case under a load-based approach.”<sup>16</sup> Calpine disagrees.

Under a deliverer/first-seller system, the attribution of emissions for *imported* power would be done identically as under a load-based system. Specifically, both systems would rely on contract data for specified power to identify and apply a source-specific emission rate. For unspecified power, a system-average, default emission rate would be used. However, under a load-based approach, contract data would be required to assign emissions for *all power* purchased for use in California – not just imported power. In contrast, a deliverer/first-seller approach would only require contract data for *imported* power in instances where the importer wanted to claim a source-specific emission rate. This, however, is only likely to occur with respect to power that is “cleaner” than the system average, which means that the importer would have an incentive to provide the information necessary to facilitate verification. For importers that are not claiming a source-specific emission rate, no contract data would be required to assign emissions under the deliverer/first-seller approach.

For the reasons stated above, the ability of a deliverer/first-seller to accurately track emissions from *imports* is comparable to a load-based system. However, a deliverer/first-seller approach has a clear advantage over a load-based system given its ability to accurately account for emissions from *in-state* sources. Because a deliverer/first-seller system is essentially a source-based system for in-state generators,<sup>17</sup> emissions from these resources will be directly measured and reported. A deliverer/first-seller approach is also superior to a load-based

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<sup>16</sup> SCPPA at 17 citing to November 9 ruling at Attachment A, Resero at 11.

<sup>17</sup> Calpine notes that EPUC’s interpretation of a first-seller approach is incorrect in this regard.

approach in addressing the contract-shuffling, because contract-shuffling will not be possible for in-state generation under a deliverer/first-seller approach.<sup>18</sup>

## VI. CONCLUSION

California has long been at the forefront of addressing climate change issues and its efforts to reduce GHG emissions have served as a model for related regional and national efforts. However, California is at a critical juncture in this process. If the Commission defers taking action to develop a market-based, cap-and-trade system, it may jeopardize the state's ability to meet the emission reduction goals in AB 32 and risks diminishing California's role in designing regional and/or national programs. Thus, it is imperative that the Commission move forward *now* with a market-based approach for reducing GHG emissions. To do this, the Commission should issue a decision that, *at a minimum*, articulates strong support for a deliverer/first-seller based cap-and-trade system. By staking out this position now, the Commission will continue its leadership role on climate change issues and further advance California's GHG emission reduction goals.

Respectfully submitted,

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<sup>18</sup> Calpine disagrees with the assertions of SCPA, the Sacramento Municipal Utilities District and others that contract-shuffling under a load-based approach has been adequately addressed by the Commission's recommendation on GHG reporting. See SCPA Comments at 15; SMUD Comments at 4.

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Dated: December 17, 2007

**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 December 17, 2007, I caused the following to be served:

**REPLY COMMENTS OF CALPINE CORPORATION ON  
TYPE AND POINT OF REGULATION 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: President Michael R. Peevey (via U.S. Mail and Email)  
ALJ Charlotte TerKeurst (via U.S. Mail and Email)  
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California Energy Commission Docket Office  
Karen Griffin, California Energy Commission



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