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

COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES ON THE ADMINISTRATIVE LAW JUDGES' RULING ON TYPE AND POINT OF REGULATION FOR THE NATURAL GAS SECTOR

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I. INTRODUCTION

Pursuant to the November 28, 2007 "Administrative Law Judges' Ruling Requesting Comments on Type and Point of Regulation for the Natural Gas Sector" (ALJ Ruling), the Division of Ratepayer Advocates (DRA) submits the following reply comments on the point of regulation for reducing greenhouse gas (GHG) emissions in the natural gas sector. DRA agrees that for purposes of GHG regulation, the natural gas sector should not include large industrial customers.[1] Instead, large industrial users of natural gas should be regulated as industrial point sources of GHG emissions. DRA's reply comments below conclude that for the time being, natural gas usage of smaller end-

[1] Attachment A to July 12, 2007 ALJ Ruling regarding Comments on Staff Natural Gas Proposal and Notice of Prehearing Conference, "California Public Utilities Commission Preliminary Staff Recommendations for Treatment of Natural Gas Sector Greenhouse Gas Emissions, p. 16." (July 12, 2007, CPUC Staff Recommendations.)

use customers should not be regulated under the cap-and-trade approach under consideration for other sectors, including the electricity sector. Instead, the focus for reducing GHG emissions from smaller end-use customers of natural gas should be on programmatic measures, including energy efficiency and conservation, with continued monitoring of emissions from natural gas use of smaller end-use customers. If excluding smaller end-use customers of natural gas produces undesirable and unintended consequences, or impairs progress in meeting the goals of the California Global Warming Solutions Act of 2006 (Assembly Bill 32, Section 38500-38598 of the Health and Safety Code), then at that point inclusion of smaller end-users of natural gas in a cap-and-trade regime should be reconsidered.

II. DISCUSSION

A. DRA supports deferring the inclusion of small commercial and residential natural gas customers in a cap-and-trade scheme, with ongoing monitoring of natural gas usage by these customers.

The opening comments of a vast majority of parties[2] support including large gas customers in a cap-and-trade scheme, while excluding small commercial/residential customers as well as natural gas infrastructure from cap-and-trade. DRA agrees that at this time, emissions reductions of the natural gas sector should be addressed through programmatic measures such as continued aggressive energy efficiency measures, strengthening building codes and appliance standards, and supporting emerging technologies.

EPNG and Mojave state that "an upstream program [for the natural gas sector] amounts to a carbon tax on fuel,"[3] and that the demand for natural gas among small residential/commercial customers are relatively inelastic, such that the increased fuel

[2] Parties in support of keeping small residential/commercial natural gas customers and the natural gas infrastructure out of the cap-and-trade system include: Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company and Southern California Gas Company (SDG&E/SoCalGas), El Paso Natural Gas Company (EPNG) and Mojave Pipeline Company (Mohave), Kern, Wild Goose Storage, Lodi Storage, and the California Manufacturers and Technology Association (CMTA).

[3] EPNG and Mojave opening comments, p.9.

prices may not trigger the desired efficiency increases. Given that natural gas is the cleanest of fossil fuels and is frequently the fuel of choice when switching from other more carbon-intensive heating fuel such as propane and liquid propane gas (LPG),[4] it would be better to defer the inclusion of the natural gas sector in a cap-and-trade system until the price of emission allowances is stabilized and the overall price impacts on consumers are better understood. Under the worst case scenario where the natural gas sector is included in the cap-and-trade market, customers could be motivated to switch to other unregulated heating fuels that are less expensive but more carbon intensive. Wild Goose Storage points out that:

> "the CPUC should keep in mind that natural gas is, in essence, part of the solution to the GHG emissions problem. Natural gas is less carbon intensive than other fuels which can be used as a replacement such as gasoline (gasoline produces 71 Kg CO2 per MMBtu while natural gas produces 53) [citation omitted] or fuel oil or diesel. If the determined scope of the GHG regulation of the natural gas sector is such that it limits the availability of natural gas, then the antithetical result will be the encouragement of fuel switching (thereby increasing the level of GHG emissions) or, as discussed above, leakage to other states, or to other countries. In either case, intended reduction of GHG emissions may not be achieved and in fact may result in increases of GHG."[5]

A secondary reason for deferring the inclusion of the natural gas sector in the cap-and-trade market is to allow the Air Resource Board to consider the potential expansion of the natural gas vehicle (NGV) industry.[6] Given the difficulty of forecasting the

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[4] In their opening comments,the Natural Resources Defense Council (NRDC)and the Union of Concerned Scientists (UCS) note that "fuel switching from electricity to natural gas generally improves overall efficiency and decreases emissions." (NRDC/UCS opening comments, p.15)

[5] Wild Goose Storage Opening Comments, p.3.

[6] Expansion of the NGV industry could also be addressed by ARB's development of a protocol to count the emissions attributed to NGVs to the transportation sector. NGVs produce up to 20 percent less greenhouse gas emissions than comparable gasoline vehicles and up to 15 percent less than comparable diesel vehicles. (source: NGV America) Until there is a fully developed natural gas fueling station infrastructure, NGVs are most practical for fleets, such as transit buses and delivery trucks. It is foreseeable to separate the natural gas consumption at the fueling stations from the rest of the

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development of the NGV industry,[7] imposing an immediate cap on the natural gas sector may lead to unintended consequences such as curtailing a budding NGV industry.[8]

DRA agrees with parties that the Joint Commissions should adopt programmatic measures to increase natural gas efficiency. For example, the CEC funded the first phase of the Super Efficient Gas Water Heating Appliance Initiative, but continued support for this initiative is needed to bring the development and commercialization of high efficiency gas water heaters into reality.[9]

DRA recommends that during the proposed deferral of a cap-and-trade program for the natural gas sector, the Joint Commissions continue to monitor the annual natural gas consumption and the accompanying GHG emissions for the small residential/commercial customers. Residential and commercial usage of natural gas could become a potentially more significant source of GHG emissions, if and when more non gas loads migrate to natural gas in response to GHG reduction efforts.[10]

While natural gas consumption has been growing slowly in the past and is projected to remain relatively flat over the next 10 years,[11] it is important to continue

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residential/commercial natural gas consumption. In contrast, it would be harder to separate the emissions attributed to plug-in electric or hybrid vehicles from typical residential electricity usage. Plug-in electric vehicles are designed to recharge using household electrical outlets without the need for a separate fueling infrastructure

[7] According to NGV America, there are over 150,000 NGVs on U.S. roads today and over 5 million worldwide. (http://www.ngvamerica.org/about_ngv/index.html.)

[8] NGVs produce up to 20 percent less greenhouse gas emissions than comparable gasoline vehicles and up to 15 percent less than comparable diesel vehicles. (http://www.ngvamerica.org/about_ngv/index.html.)

[9] NRDC and the UCS also suggested leveraging AB 1470 to increase the penetration of solar water heating systems.

[10] Residential and commercial usage of natural gas accounts for nearly 8% of the 2004 statewide GHG emissions. (July 12, 2007, CPUC Staff Recommendations. p. 7.).

[11] The California Energy Commission (CEC) forecast that California's residential and commercial natural gas consumption will grow at the respective rate of 1% and 0.8% annually between 2007 and 2017. (Revised Natural Gas Market Assessment, CEC Staff Report, August 2007)

monitoring the consumption level of the natural gas sector in order to ensure that total statewide emissions comply with the targets established by AB32.[12]

III. CONCLUSION

DRA respectfully requests that the Joint Commissions recommend that the Air Resources Board defer inclusion of small-end users of natural gas from the cap-and-trade regime currently under development, but require monitoring of both those emissions and whether excluding natural gas usage of small customers would prevent California from

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[12] While DRA supports deferral of inclusion of the gas sector in the cap-and-trade regime, it does not agree with some of the reasons advanced for the deferral. PG&E argues for exclusion of the natural gas sector from a cap-and-trade system because there are limited cost effective emission reduction opportunities available in this sector. (PG&E comments, p.3.) However, it is expected that under a well functioning cap-and-trade system, regulated entities that have higher emission reduction costs would purchase allowances from those entities that have lower emission reduction costs, resulting in an equilibrium allowance value that is non-zero. The fact that a sector is faced with limited cost effective reduction opportunities should not be the sole reason for excluding the sector from cap and trade.

SDG&E and SoCalGas oppose regulating the natural gas sector by placing the compliance obligation at the level of the local distribution company (LDC) because the LDCs are not using the natural gas and therefore have no control over the emissions. (SDG&E/SoCalGas comments, p. 8.) This is no different than in the electricity sector, where the electric utilities serve as procurement agents on behalf of their customers but have no direct control over the usage of electricity. A load-based regulatory regime would place the point of compliance at the utility level, rather than the end-user level. Similarly, a source-based regulatory regime will place the point of compliance at the generator level, which also has no control over the usage of electricity. For both the electricity and the natural gas sectors, regulating upstream providers is the only administratively feasible option of meeting the goals of AB 32.

meeting the goals of AB 32. In the meantime, the Commission should continue to require utilities to promote conservation and pursue cost effective energy efficiency savings.

Respectfully submitted,

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January 8, 2008

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I hereby certify that I have this day served a copy of the foregoing document **"COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES ON THE ADMINISTRATIVE LAW JUDGES' RULING ON TYPE AND POINT OF REGULATION FOR THE NATURAL GAS SECTOR" R.06-04-009.**

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/s/ Joanne Lark

Joanne Lark

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