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**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)

**ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION
OF THE STATE OF CALIFORNIA**

In the Matter of:

AB 32 Implementation: Greenhouse Gases

Docket 07-OIIP-01

**REPLY COMMENTS OF THE
LOS ANGELES DEPARTMENT OF WATER AND POWER
ON THE ADMINISTRATIVE LAW JUDGES' RULING REQUESTING COMMENTS ON
MODELING-RELATED ISSUES**

January 18, 2008

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**REPLY COMMENTS OF THE
LOS ANGELES DEPARTMENT OF WATER AND POWER
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MODELING-RELATED ISSUES**

In accordance with Rule 14 of the Rules of Practice and Procedure of the Public Utilities Commission ("CPUC" or "Commission") of the State of California, the Los Angeles Department of Water and Power ("LADWP") hereby files the following Reply Comments submitted in response to the "Administrative Law Judges' Ruling Requesting Comments on Modeling-Related Issues," filed November 9, 2007 , in CPUC Rulemaking R.06-04-009 ("Rulemaking") and California Energy Commission (CEC) Docket # 07-OIIP-1.

I. INTRODUCTION

The LADWP appreciates the opportunity to provide reply comments on issues related to modeling work developed by Energy and Environmental Economics, Inc. (E3) to date (Attachment B of the Ruling), and the CPUC Staff workpaper entitled "Greenhouse Gas Emissions Reduction Measures for the Electricity and Natural Gas Sectors Under Consideration as Part of R.06-04-009 (Attachment A of the Ruling). We recognize the critical importance of this modeling effort to inform the California Air Resources Board's (CARB) macroeconomic modeling of the broader economic impacts of potential greenhouse gas (GHG) emission reduction measures across all sectors and to support the CARB's efforts to establish sector- and entity-specific GHG emission reduction requirements.

We also appreciate that the CPUC modeling effort will be done in collaboration with the CARB's extensive multi-sector economic impact assessment, which will include models such as CARB's Environmental Dynamic Revenue Assessment Model (E-

DRAM), Energy 2020, BEAR Model and additional work by the Electric Power Research Institute (EPRI). The LADWP looks forward to actively participating in and contributing to the stakeholder and workgroup discussions to more closely review and evaluate these modeling efforts.

II. SPECIFIC COMMENTS

A. *Economic Models Have Fundamental Limitations That Must Be Recognized and Acknowledged.*

As stated in our initial comments, the LADWP has fundamental concerns with the use of the E3 model as a *definitive* tool for public policy development, in part, because some of the assumptions can never come to fruition.¹ The CARB was correct, and we strongly agree, that the “determination of what is cost-effective requires policy judgment and is not purely technical in nature.”³ Other parties have expressed similar concern about the limits of the model as follows:

- “There are many uncertainties inherent in any model. Many inputs are ‘best guesses’ at future scenarios. Potential changes in costs, technology, and demand curves all introduce uncertainty. Therefore, it is important to remember that any results from this model are simply estimates. Models can be useful in setting upper/lower bounds and predicting relative cost-effectiveness. However, it would be dangerous to base policy decisions on the output of the model.” DRA at 4.
- “We are concerned that the E3 model does not account for the risks associated with different resource

¹ LADWP Opening Comments at 2.

³ California Air Resources Board Scoping Plan Workshop, January 16, 2008, Session 2 Slide Presentation at 13.

scenarios...Providing a single deterministic cost estimate of each resource scenario fails to provide a complete picture of that scenario's costs, and thus provides incomplete information for the Commissions and the California Air Resources Board to determine GHG regulations for the electricity sector." NRDC at 16.

- "There are so many uncertainties and alternative assumptions possible that comparing them all is very difficult. We are not sure that any model could adequately test all of the various uncertainties pertaining to resource potential and cost estimates, especially as new technology and more money pours into new resources and development. This means that while the model allows the user to test different scenarios that can be envisioned now, it does not necessarily give an accurate picture very far into the future, as cost and resource potential change, and the market changes as well." GPI at 8.
- "Poor characterization of any of the seven explicitly modeled entities will seriously erode confidence in the use of these publicly available models as a policy evaluation guide." SMUD at 1.
- "PG&E is concerned that the uncertainties inherent in resource potential and costs estimates are not adequately identified." PG&E at 37.

B. Sensitivity Analyses Should Be Conducted

A number of parties have commented on the need to review load forecast inputs in order to understand the sensitivity of the emission allocation to the forecast and to review alternative load forecast scenarios. LADWP agrees with this assessment. We look forward to further discussions at the workgroup level to refine the inputs to the model.

C. The Role of Renewable Energy

A number of parties and E3 recognize that renewable energy is a key strategy toward meeting our collective goals pursuant to AB 32, and the LADWP strongly agrees

with that assertion.⁴ While some parties are skeptical about meeting a 20% renewable portfolio mix by 2010, we believe that level is achievable. Post 2010, we support a statewide goal to increase the use of renewable energy to 35%.⁵

D. *The Role of Energy Efficiency to Reduce the State's GHG Emissions Must Be A Priority For All LSEs*

Energy efficiency must also continue to be emphasized as a key GHG emission reduction strategy. As stated in our opening comments, E3 assumed complete success in energy efficiency, which is a “stretch goal” that may not be achieved in practice. However, it is appropriate public policy to retain this as a stretch goal. Energy efficiency must continue to be evaluated, funded, supported by all LSEs, by the CPUC and the CEC, and ultimately included in CARB's AB 32 GHG emission reduction program.

Relative costs by region or LSE are difficult to determine, because it is difficult to predict how energy efficiency programs will be effective in modifying human behavior in an ever advancing, energy-consuming, technological era that is increasing demand for electric service. Despite this uncertainty in cost projections, energy efficiency should be a priority for all LSEs. LADWP has made energy efficiency a priority. The LADWP will be pursuing an accelerated Maximum Achievable scenario for the next five years and is increasing its savings targets beyond Maximum Achievable energy efficiency, consistent with the LADWP savings goals submitted to the California Energy

⁴ LADWP, SCPPA, CEERT, GPI, NRDC, SMUD, Solar Alliance.

⁵ In May 2007, Los Angeles Mayor Antonio R. Villaraigosa set several new goals for the City of Los Angeles and for the LADWP, including increasing the use of renewable energy to 35% by 2020. Additionally, the Los Angeles Board of Water and Power Commissioners adopted the LADWP 2007 Integrated Resource Plan that also reflects this commitment to renewable energy.

Commission in September 2007.⁶

E. Equitable Compliance Within The Electricity Sector

Some parties express frustration that there is not a commitment statewide to renewable energy. For example, SCE asserts in their Opening Comments that not all LSEs are committed to the RPS:

“It is unreasonable and impractical for IOUs and their respective customers to be responsible for the full cost and complete implementation of the State’s total RPS and GHG emissions goals. Municipal utilities and their customers should also be held to the same standards as the IOUs and be required to contribute equally to California’s requirements.” SCE at 5.

This is not an accurate reflection of the POU community. Now that the California Global Warming Solutions Act of 2006 is in place, all LSEs whether IOUs or POUs, will have a compliance obligation to reduce GHG emissions. While there may be a different governance structure between IOUs and POUs, there is, in fact, an overall statewide commitment to a 20% RPS. AB 32 did not envision changing the governance structure of POUs, but instead, envisioned inclusion of POUs in the State’s efforts to reduce GHG emissions. To that end, the LADWP is fully committed to working in partnership with the State to achieve the goals set forth in AB 32. The LADWP supports a statewide policy that all LSEs, whether IOU or POU, should have a 20% RPS standard, and we further support a statewide 35% RPS.

California does have the potential to increase renewable energy beyond a 20%

⁶ Los Angeles Board of Water and Power Commissioners, Resolution 008-076 adopted September 18, 2007 approving the LADWP’s target for energy efficiency savings and demand reduction over 10 years, pursuant to AB 2021.

⁸ Health & Safety Code, Section 38562(d)(2).

RPS. However, caution should be taken to develop new statutory programs like an RPS beyond 20%. Given the statutory construction of the California Global Warming Solutions Act of 2006 (AB 32), it is important that if a multi-sector market-based program is ultimately adopted, the limitations imposed the electricity sector should not result in unintended consequences where a disproportionate share of emission reductions fall to the electricity sector.

For regulations pursuant to Part 5 (commencing with Section 38570), the reduction is ***in addition to any greenhouse gas emission reduction otherwise required by law or regulation*** and any other greenhouse gas emission reduction that otherwise would occur [emphasis added].⁸

A multi-sector market-based compliance program is intended to provide regulated entities with flexibility to meet compliance obligations, and should not penalize efforts to implement an aggressive RPS goal by *increasing* the electricity sector's overall emission reduction goal.

Additionally, the LADWP recognizes that as we move toward 2020 and reduce emissions to meet 1990 levels, all local, regional and statewide programs that result in GHG emission reductions will need to be expanded, including funding new technologies and other significant portfolio shifts. Our collective goal as an industrial sector should be to work toward the 1990 target while mitigating overall costs for our customers, preserving electric system reliability and the stability of the wholesale market. "CEERT strongly recommends that measures adopted to reduce statewide GHG emissions from the electricity sector recognize the different starting positions of different LSEs and the

time required to make significant changes in their portfolios. LSEs should not be penalized for their current emissions levels, but rather for lack of future progress toward adopted goals.” CEERT at 29. We strongly agree. LADWP supports an administrative allocation of allowances at the program’s inception date based on current and accurate emissions levels, with a declining cap that ultimately brings each regulated LSE to an emission level that best reflects industry best practices.¹⁰

Further, the modeling proceeding should produce objective, usable economic analysis to help policy makers consider financial impacts of various proposals. It should not be used to support a process to pick financial winners and losers or create a divide within the electricity sector.

The LADWP suggests that the CPUC, CEC and ultimately the CARB consider a number of economic analytical tools to evaluate scenarios and consider all cost impacts, both direct and indirect. Further, the LADWP strongly supports a commitment to a robust renewable generation fleet and a strong and expandable energy efficiency policy.

¹⁰ LADWP, Opening Comments of the Request for Comments on Allocation Allowance Issues October 31, 2007 page 2

III. CONCLUSION

The LADWP appreciates the opportunity to provide these reply comments to the CPUC and CEC for your consideration.

Dated: January 18, 2008 Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the attached:

REPLY COMMENTS OF THE LOS ANGELES DEPARTMENT OF WATER AND POWER ON THE ADMINISTRATIVE LAW JUDGES' RULING REQUESTING COMMENTS ON MODELING-RELATED ISSUES

on all known parties to R.06-04-009 by transmitting an e-mail message with the document attached to each party named in the official service list, updated January 17, 2008. See attached service list. I served a copy of the document on those without e-mail addresses by mailing the document by first-class mail addressed as follows:

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Executed this 18th day of January 2008, at Los Angeles, California.

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