

**BEFORE THE CALIFORNIA ENERGY
CONSERVATION AND DEVELOPMENT COMMISSION**

AB 32 Implementation

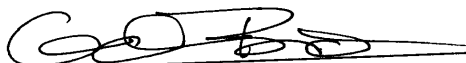
Docket No. 07-OIIP-1

**COMMENTS OF CONSTELLATION NEWENERGY, INC., AND
CONSTELLATION ENERGY COMMODITIES GROUP, INC. ON
THE PROPOSED DECISION OF PRESIDENT PEEVEY CONCERNING
GREENHOUSE GAS REGULATORY STRATEGIES**

Pursuant to the February 15, 2008 *Notice of Availability*,¹ Constellation NewEnergy, Inc. and Constellation Energy Commodities Group, Inc. (collectively, “Constellation”) hereby submit, as Attachment A, the comments Constellation filed with the California Public Utilities Commission on the Proposed Decision of Commission President Michael R. Peevey, *Interim Opinion On Greenhouse Gas Regulatory Strategies*, issued February 8, 2008 (“Proposed Decision” or “PD”).

Respectfully submitted,

February 28, 2008



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¹ Posted at http://www.energy.ca.gov/ghg_emissions/meetings/2008-02-15_notice_of_availability.html.

**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

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Dated: February 28, 2008

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I. Introduction and Summary

Pursuant to Rule 14.3 of the California Public Utilities Commission ("CPUC" or "Commission") Rules of Practice and Procedure, Constellation Energy Commodities Group, Inc. and Constellation NewEnergy, Inc. (collectively, "Constellation") submit these comments on the Proposed Decision of Commission President Michael R. Peevey, *Interim Opinion On Greenhouse Gas Regulatory Strategies*, issued February 8, 2008 ("Proposed Decision" or "PD").

In most respects, Constellation supports the key conclusions reached in the Proposed Decision with respect to recommendations to the California Air Resources Board on greenhouse gas strategies applicable to the electricity sector, particularly:

- California should move forward with the development of a cap-and-trade program so as to ensure a viable platform for compliance with AB 32 requirements, while at the same time remaining mindful that such a system must eventually (and hopefully sooner rather than later) integrate with regional, federal, and potentially international programs.

- The adoption of the “deliverer” as the point of regulation will be the best approach for managing compliance with the AB 32 requirements, and will most efficiently integrate with regional and national programs as they come into fruition.
- The system for the distribution of allowances should include an auction component for a portion of the allowance distribution, and that the overall program for allowance distribution requires further study and stakeholder input.
- Steps should be taken, through regulation or legislation as appropriate, to ensure that the all deliverers in California are subject to GHG compliance regulations.

There are three areas of the Proposed Decision, however, that Constellation believes require clarification or modification:

- Constellation believes that auctioning of allowances will emerge over time as the most efficient and transparent way to distribute allowances. However, Constellation believes that there should be a transition to 100% auctions, and urges the Commission to clarify the Proposed Decision so that the ongoing stakeholder discussions on allowance distribution include a determination of the appropriate transition period.
- Constellation urges the Commission to modify the Proposed Decision to clarify that Energy Service Providers (“ESPs”) should not be subject to Energy Efficiency (“EE”) program mandates.

II. Constellation Comments

A. There Should Be a Transition Period to 100% Auctioning of Allowances.

Constellation has commented previously on the issue of allowance allocations versus auctions, and includes by reference its submission on October 31, 2006 in this regard. In summary:

For the initial stages of California's cap-and-trade program, Constellation believes that a 50-50 split between a free allocation of allowances and an auctioning of the balance of allowances best strikes the appropriate balance between the need to accomplish GHG emission reductions while simultaneously mitigating some of the impacts on developing markets, investment in new technologies, consumers' costs, and compliance costs for existing emission sources and new entrants. Over time, Constellation believes that the initial 50-50 split should transition to a 100% auction system for the distribution of allowances which will serve as a valuable market development tool offering price transparency and market efficiencies.¹

Therefore, Constellation urges the following modifications to the Proposed Decision's Findings of Fact and Ordering Paragraphs to provide for a transitional phase-in to 100% allocation auctions:

26. The auctioning of ~~a at least some~~ portion of the emission allowances available to the electricity sector would promote liquidity in the emission allowance market, improve the accuracy of emission allowance prices as a reflection of marginal emission reduction costs, and allow new market entrants access to allowances on an equal basis with other parties.

27. It is reasonable to require that ~~a at least some~~ portion of the GHG emissions allowances for the electricity sector be auctioned in a GHG emissions cap-and-trade system in which deliverers are the point of regulation for the electricity sector. As part of this approach, all proceeds from the auctioning of allowances for the electricity sector would be used in ways that benefit electricity consumers in California.

28. ~~Although t~~The record in R.06-04-009 is not sufficient, at this time, to determine a reasonable mixture of auctioning and the administrative allocation of GHG emissions allowances for the electricity sector, a gradual increase in the percentage of allowances to be subject to auction over a reasonable transition period is appropriate such that at the end of the transition and going forward 100% of the allowances would be subject to auction.

29. The record in R.06-04-009 is not sufficient, at this time, to determine a reasonable approach for the administrative allocations of GHG emissions allowances, ~~if such free distributions are undertaken.~~

¹ See *Comments Of Constellation NewEnergy, Inc., And Constellation Energy Commodities Group, Inc. On ALJ Ruling Requesting Comments And Noticing Workshop On Allowance Allocation Issues*, October 31, 2007, pages 5-6.

29a. The purpose of an orderly and phased transition to 100% allocation auctions is to provide for an orderly development of the cap-and-trade market and an opportunity for existing entities to transition their existing market positions and manage their risks as the new regulatory program evolves.

B. Constellation Urges The Commission To Modify The Proposed Decision To Clarify That Energy Service Providers (“ESPs”) Should Not Be Subject To Energy Efficiency Requirements.

Constellation concurs that both CPUC jurisdictional LSEs and the publicly owned utilities (“POUs”) should be subject to equivalent Renewable Portfolio Standard (“RPS”) requirements. Constellation also concurs with Ordering Paragraph No. 1, which states

We recommend that the California Air Resources Board (ARB) adopt mandatory levels of energy efficiency savings for publicly owned utilities (POUs), the same as those required of investor owned utilities (IOUs) by the California Public Utilities Commission (Public Utilities Commission), and consistent with energy savings requirements as recommended by the California Energy Commission (Energy Commission).²

However, contrary to the clear intent of Ordering Paragraph No. 1, the following statement from the PD seems to imply that all CPUC jurisdictional LSEs should also be subject to EE program mandates:

For the electricity sector, we recommend that all retail providers in California be required to provide a minimum level of energy efficiency programs and renewable energy delivery to their customers.³

Imposing an EE program mandate on ESPs would be inappropriate for several reasons. First and foremost, the IOUs (as the distribution companies), receive public goods charge and public purpose program funding as well as other Commission-directed rate relief to support their EE programs (including the associated administrative costs) and to decouple utility revenue from its energy sales. More importantly, all customers—including direct access customers served by

² See Proposed Decision, page 118.

³ See Proposed Decision, page 4.

ESPs—are utility distribution customers that pay for and may participate in those public utility programs. Therefore, to impose a mandated EE program requirement on ESPs would place them at a distinct competitive disadvantage to the IOUs.

Second, ESPs often provide energy management and assessment services to their customers that will typically lead those customers to participate in the most cost-effective utility EE programs. Accordingly, any notion that customers who secure their energy commodity requirements from ESPs somehow miss out or fail to participate in EE programs and thus should be captured through a new mandate on ESPs is misplaced.

Lastly, significant efforts have occurred in the EE dockets to maximize the efficiency of the programs through a re-consolidation of program administration by the public utilities. The suggestion that a new EE mandate be imposed on ESPs runs contrary to those considerable efforts.

Constellation therefore requests that the Proposed Decision—specifically the language cited above as well as Finding of Fact No. 30—more precisely state that the Commission’s EE program recommendation should be imposed on other retailing entities that also distribute power, i.e., the POUs, as reflected in Appendix A. Constellation believes that the Commission’s intent in the cited passage was to create more parity in requirements between jurisdictional and non-jurisdictional distribution companies, and not to suggest imposition of a new EE program requirement on ESPs contrary to the EE program structure that has been already developed at the CPUC. This intent is best reflected in the language found in existing Ordering Paragraph No. 1.

III. Conclusion

Constellation applauds the Commission’s efforts in developing these comprehensive recommendations regarding GHG emission program for the electricity sector and believes they

provide a strong platform to initiate implementation and compliance with AB 32 by the CARB.

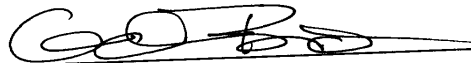
For the reasons set forth above, Constellation suggests specific changes to the Proposed Decision to allow for a transitional program to phase in 100% allocation auctions and to clarify that language recommending imposition of energy efficiency program mandates is addressed to non-CPUC jurisdictional distribution utilities such as the POU's as clearly stated in Ordering Paragraph No. 1. Appendix A provides specific language changes to the PD's Findings of Fact.

Respectfully submitted,

Dated: February 28, 2008

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Appendix A
Recommended Modifications to Findings of Fact

Findings of Fact

26. The auctioning of ~~a at least some~~ portion of ~~the~~ emission allowances available to the electricity sector would promote liquidity in the emission allowance market, improve the accuracy of emission allowance prices as a reflection of marginal emission reduction costs, and allow new market entrants access to allowances on an equal basis with other parties.

27. It is reasonable to require that ~~a at least some~~ portion of ~~the~~ GHG emissions allowances for the electricity sector be auctioned in a GHG emissions cap-and-trade system in which deliverers are the point of regulation for the electricity sector. As part of this approach, all proceeds from the auctioning of allowances for the electricity sector would be used in ways that benefit electricity consumers in California.

28. ~~Although t~~The record in R.06-04-009 is not sufficient, at this time, to determine a reasonable mixture of auctioning and the administrative allocation of GHG emissions allowances for the electricity sector, a gradual increase in the percentage of allowances to be subject to auction over a reasonable transition period is appropriate such that at the end of the transition and going forward 100% of the allowances would be subject to auction.

29. The record in R.06-04-009 is not sufficient, at this time, to determine a reasonable approach for the administrative allocations of GHG emissions allowances, ~~if such free distributions are undertaken.~~

29a. The purpose of an orderly and phased transition to 100% allocation auctions is to provide for an orderly development of the cap-and-trade market and an opportunity for existing entities to transition their existing market positions and manage their risks as the new regulatory program evolves.

30. It is reasonable for the State of California to apply the same minimum requirements in the areas of energy efficiency and energy conservation to all entities that provide ~~retail sales,~~ transportation, and/or distribution of electricity or natural gas to end-users in California.

Ordering Paragraph

8. We recommend that ~~at least some~~ a portion of the GHG emission allowances available to the electricity sector be auctioned at the completion of a transition period during which there will be a phasing in of the percentage of allocations subject to auction, with at least some portion of the proceeds from the auctioning of allowances for the electricity sector being used in ways that benefit electricity consumers in California.

End of Appendix A

Certificate of Service

I hereby certify that I have this day served a copy of *Comments Of Constellation NewEnergy, Inc., And Constellation Energy Commodities Group, Inc. On The Proposed Decision Of President Peevey Concerning Greenhouse Gas Regulatory Strategies* 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. Parties without e-mail addresses were mailed a properly addressed copy by first-class mail with postage prepaid.

Executed on February 28, 2008 at Sacramento, California.

/s/

Eric Janssen

R.06-04-009
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February 28, 2008

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