BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA AND THE
CALIFORNIA ENERGY COMMISSION

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emission Standards into Procurement Policies.	Rulemaking 06-04-009 (Filed April 13, 2006)
Order Instituting Informational Proceeding – AB 32.	CEC Docket No. 07-OIIP-01

SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY REPLY COMMENT

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Dated: March 4, 2008

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SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY
REPLY COMMENT

In accordance with Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission ("CPUC"), the Southern California Public Power Authority ("SCPPA") respectfully submits this reply comment to address factual and legal errors in the February 28, 2008 opening comments of other parties regarding the Proposed Decision ("PD") mailed on February 8, 2008. This reply comment is being submitted simultaneously to both the CPUC and the California Energy Commission ("CEC") (jointly, "Commissions").

I. AUCTION PROCEEDS ARE NOT "FEES" AUTHORIZED BY AB 32.

The PD would require "deliverers" of electricity to participate in a multi-sector cap-and-trade market. As a result "deliverers" of electricity would be required to hold allowances to cover the emissions associated with the electricity that they deliver to the California grid. The PD concludes that "at least some portion of the allowances available to [deliverers] should be auctioned." PD at 85.

The prospect of allowances being auctioned raises a question about the legality of an auction and the collection of auction proceeds by the State. In their opening comment, San Diego Gas & Electric Company ("SDG&E") and Southern California Gas Company ("SoCalGas") contend that "auctioned revenues are legally a fee…." SDG&E/SoCalGas at 7. This implies that auctioning is authorized under Assembly Bill ("AB") 32. AB 32 specifically provides for the Air Resources Board ("ARB") to adopt "a schedule of *fees* to be paid by the sources of greenhouse gas emissions regulated pursuant to this division, consistent with Section 57001." Cal. H & S Code § 38597 (emphasis added).

However, the "fees" that ARB may impose under Cal. H & S Code § 38597 do not encompass auction proceeds. The ARB's "schedule of fees" must be "consistent with Section 57001…." Health & Safety Code § 57001 covers administrative fees, not auction proceeds. This was carefully explained in a letter submitted to the Assembly Daily Journal on August 31, 2006 by Speaker Nuñez. The Speaker explained: "AB 32 authorizes the California Air Resources Board to adopt a schedule of fees for the direct cost of administering the … programs established pursuant to the bill's provisions. It is my intent that any funds provided by Health and Safety Code Section 38597 (the part of AB 32 that authorizes the schedule of fees) be used solely for the direct costs incurred in administering this division." Assembly Daily Journal at

7646 (Aug. 31, 2006) (http://www.assembly.ca.gov/clerk/billslegislature/srchframe.htm). This interpretation of section 38597 was reiterated by the Director of the ARB Office of Climate Change, Chuck Schulock, at the ARB "mechanisms" workshop in Oakland, California, on January 16, 2008.

The reason that Speaker Nuñez in ARB carefully interpreted section 38597 to not include auction proceeds was to assure that AB 32 would not be seen as being a revenue generating statute. If AB 32 were a revenue generating statute, it would have been required to be approved by two-thirds vote of the Legislature. Article XIIIA of the California Constitution provides that "any changes in State taxes enacted for the purpose of increasing revenues … must be imposed by an Act passed by not less than two-thirds of all members elected to each of the two houses of the legislature." AB 32 was not passed by a two-thirds vote.

Insofar as auction revenues are *not* fees, the generation of auction revenue is not explicitly authorized by AB 32. SCPPA recommends that the Commissions reevaluate the legality of auctioning allowances as contemplated in the PD, given the narrow scope of section 38597.

Certainly, the generation of auction proceeds could be authorized by subsequent legislation. The PD recognizes that "additional legislative authority may be needed to achieve some of the objectives" of the PD. PD at 3. However, any legislation approving the auctioning of allowances would likely be interpreted as a measure enacted "for the purposes of increasing revenues" within Article XIIIA of the California Constitution, in which case a two-thirds vote of the Legislature would be required. As contemplated in the PD, "deliverers" as well as all other participants in the anticipated multi-sector cap-and-trade program would be required to acquire allowances. The Green Power Institute ("GPI") observes that the payments for allowances would be "a quasi carbon tax…." GPI at 3-4. To the extent to which the requirement that all cap-and-trade program participants hold allowances to cover their emissions, the imposition of an auction on them would be likely to be interpreted as the imposition of a revenue generating mechanism which would require a two-thirds vote of the Legislature.

II. SDG&E/SOCALGAS AND PG&E'S ADVOCACY FOR DISPARATE TREATMENT OF THE NATURAL GAS AND ELECTRICITY SECTORS RESTS ON A FACTUAL ERROR.

Both SDG&E/SoCalGas and Pacific Gas & Electric Company ("PG&E") support including the electric sector in a multi-sector cap-and-trade system while excluding the natural

gas sector. SDG&E/SoCalGas at 2; PG&E at 2, 7. Their support for divergent treatment of the gas and electric sectors rests on the supposition that the sectors are different in how they would achieve GHG reductions. They assume: "First and foremost, there are significantly fewer options at this time to reduce GHG emissions in the natural gas sector." PD at 107.

The assumption that there are "fewer options" to reduce GHG emissions in the gas sector is a factually erroneous basis for treating the gas and electric sectors differently. Both sectors would attain GHG emission reductions by implementing energy efficiency measures and by relying more heavily on renewable resources. The combination of energy efficiency and renewable resources is just as available to the natural gas sector as the electric sector. The Natural Resources Defense Council ("NRDC") noted that just as energy efficiency and renewables will be the primary source of emission reductions in the electric sector, "energy efficiency, solar water and space heating, biomethane, and combined heat and power" will be available to the natural gas sector. NRDC at 3.

If the natural gas sector is not to be required to participate in the multi-sector cap-and-trade program as advocated by SDG&E/SoCalGas and PG&E, then there certainly should be an option for retail providers that are also deliverers of electricity to have an option to exclude emissions associated with their deliveries for service to native load from the multi-sector cap-and-trade program. Such an option would parallel permitting local distribution companies ("LDCs") to exclude the emissions associated with their deliveries of gas from the multi-sector cap-and-trade program. SCPPA and the Los Angeles Department of Water and Power ("LADWP") proposed in their opening comments that electric sector retail providers that are also "deliverers" of electricity to serve native load should be permitted an option to exclude the emissions associated with those deliveries from operation of the cap-and-trade program.

SCPPA and LADWP also proposed that there be a cap on a retail provider's emissions associated with deliveries to service to native load, with the cap declining over time. If the natural gas sector is excluded from the cap-and-trade program as proposed by SDG&E/SoCalGas and by PG&E, then there should be a declining cap on an LDC's emissions associated with service to the LDC's native load similar to the cap that SCPPA and LADWP have proposed on emissions associated with deliveries that are dedicated to serve a retail provider's native load.

III. THE ARGUMENT THAT NEW SUPPLY/SIDE MANDATES SHOULD NOT BE ADOPTED SIMULTANEOUSLY WITH A CAP-AND-TRADE PROGRAM FAILS TO RECOGNIZE THAT ADOPTION OF THE "DELIVERER"

APPROACH REDUCES INTEREST IN EMISSION REDUCTIONS FOR RETAIL PROVIDERS THAT ARE NOT FULLY RESOURCED.

SDG&E/SoCalGas argue that "new supply-side mandates should not be simultaneously adopted with the cap-and-trade program." SDG&E/SoCalGas at 4. Particularly, SDG&E/SoCalGas argue that the Commissions "should not recommend to ARB that it is necessary to adopt new state mandated RPS levels." *Ibid* at 5. It seems that the Division of Ratepayer Advocates ("DRA") agrees. DRA contends that "more restrictive regulatory mandates could result in fewer benefits from the inclusion of the electricity sector in the California cap-and-trade program." DRA at 4.

It may be true that additional RPS requirements or energy efficiency requirements are not necessary for retail providers that are fully-resourced and which, as a consequence, would be "deliverers" for all or most of the electricity that they provide to their customers. To the extent to which retail providers are also "deliverers," they would be required to acquire allowances to cover their emissions and, accordingly, would have an incentive to reduce emissions to reduce the cost of allowances.

The southern California publicly-owned utilities ("POUs") that are members of SCPPA tend to be fully resourced. Thus, for them, it may be unnecessary to impose both programmatic mandates and a requirement that they participate in the cap-and-trade program. However, California investor-owned utilities ("IOUs") are *not* fully resourced. As a legacy of AB 1890 and "deregulation" of the California electricity market, a much more substantial portion of the electricity that IOUs provide to their native load is acquired through the wholesale market.

Under the PD, the IOUs would not be required to participate in the cap-and-trade program to acquire allowances to cover the emissions associated with the portion of electricity they acquire through wholesale transactions in California. Insofar as the IOUs would be "deliverers" of electricity for a much smaller percentage of electricity that they serve to their native load in comparison to POUs, IOUs will have a diminished incentive to implement energy efficiency and renewable resource programs. CPUC President Peevey observed: "If we were to take a source-based approach and apply emissions caps only to generators, then it would be much more difficult to integrate energy efficiency and renewables policies into our overall climate strategy." Scoping Memo at 9, R.06-04-009 (Feb. 2, 2007). For the IOUs that tend to be far less than fully-resourced, it is necessary to have robust programmatic mandates as envisioned

in the PD, although the programmatic mandates would be far less necessary for the POUs that may be included in the PD's cap-and-trade program.

IV. ARGUMENTS THAT ALLOWANCES SHOULD BE ALLOCATED TO LOAD SERVING ENTITIES FOR SUBSEQUENT AUCTION ARE INAPPROPRIATE AND ERRONEOUS.

SDG&E/SoCalGas contend that the PD should be modified to provide that if there is an auction, there should be a "allocation to LSEs, with a subsequent non-discriminatory auction by or on behalf of LSEs of all allowances to first deliverers." SDG&E/SoCalGas at 6. PG&E supports the same methodology, although PG&E does not advocate revising the PD.

The SDG&E/SoCalGas proposal for modification of the PD to provide for an administrative allocation of allowances to load-serving entities ("LSEs") with a subsequent auction to "deliverers" that, under the PD, would be required to participate in a cap-and-trade program is entirely inappropriate. The proposal descends to a level of detail about auctioning allowances that is not reached in the PD. Moreover, the proposal is substantively unfair and, as such, should be categorically rejected. The underlying assumption is that there would be an administrative allocation of allowances to LSEs on a basis of their retail sales or "output." If the LSEs were then to resell the allowances to the "deliverers" that would be required to participate in the cap-and-trade program and hold allowances as envisioned in the PD, there would be a massive transfer of wealth from retail providers that have a relatively low carbon intensity such as PG&E to retail providers that are also "deliverers" which currently have a higher carbon intensity such as the SCPPA members. *See* SCPPA Supplement to Opening Comment and Reply Comment on Allowance Allocation Issues at 4-6 (November 14, 2007).

V. CONCLUSION

For the reasons set forth herein and in SCPPA's February 28, 2008 opening comment, SCPPA recommends that the PD be revised as SCPPA proposed in its opening comment.

Respectfully submitted,

/s/ Norman A. Pedersen

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Attorney for the **SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY**

Dated: March 4, 2008

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the **SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY REPLY COMMENT** on the service list for CPUC Docket No. R.06-04-009 and CEC Docket No. 07-OIIP-01 by serving a copy to each party by electronic mail and/or by mailing a properly addressed copy by first-class mail with postage prepaid.

Executed on March 4, 2008, at Los Angeles, California.

/s/ Sylvia Cantos

Sylvia Cantos

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