

**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 16, 2004)

**BEFORE THE CALIFORNIA ENERGY COMMISSION**

AB 32 Implementation – Greenhouse Gas  
Emissions.

Docket No. 07-OIIP-01

**COMMENTS OF THE ALLIANCE FOR RETAIL ENERGY MARKETS  
ON DESIGN OF GREENHOUSE GAS REGULATORY STRATEGIES**

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June 2, 2008

<b>DOCKET</b>
07-OIIP-1
DATE JUN 02 2008
RECD. JUN 02 2008

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In response to the Administrative Law Judge's Ruling Modifying Schedule and Correcting Suggested Outline for Comments and Reply Comments dated May 20, 2008, and a series of related Rulings dated April 16, 2008, May 6, 2008, and May 13, 2008, the Alliance for Retail Energy Markets respectfully submit these comments.

**SUMMARY**

AReM is a California non-profit mutual benefit corporation that represents the interests of electric service providers ("ESPs") who together serve the majority of direct access market in California. AReM's comments below are predicated on the California Air Resource Board ("ARB") adopting the joint recommendation of the California Public Utilities Commission ("CPUC") and the California Energy Commission to base the

regulation of greenhouse gas emissions in the electricity sector on the “first seller/deliverer” point of regulation model described in Decision (“D.”) 08-03018. Many of the questions posed in the aforesaid Rulings are not directly applicable to the members of AReM and/or touch on issues that have not been formally deliberated by the association’s members. However, the absence of comments in response to any particular question should not be construed as indicating the issues addressed by the question are not important to AReM, but rather that the organization has not reached a consensus on a policy recommendation. Furthermore, AReM has reviewed the comments being filed today by the Western Power Trading Forum (“WPTF”), and where AReM agrees with WPTF’s comments so indicates that agreement.

### **GENERAL ISSUES**

#### **5/13/08 Ruling, Q3:**

**For any non-market-based emission reduction measures for electricity discussed in your opening comments, are there any overlap or compatibility issues with the potential electricity sector participation in a cap-and-trade program? Explain.**

We believe there is a strong linkage between the Renewable Portfolio Standard (“RPS”) and energy efficiency programs already put in place by the CPUC and non-market based greenhouse gas emissions reduction mechanisms. With regard to energy efficiency requirements that may be mandated by the ARB for all load-serving entities (“LSEs”), AReM believes that it will be more efficient and cost effective to continue to have the investor-owned utilities (“IOUs”) serve as program administrators, with equal access to energy efficiency offerings for all customers located in the IOU’s service territory, including direct access customers.

**5/13/08 Ruling, Q10:**

**What evaluation criteria should be used in assessing each issue area in these comments (allowance allocation, flexible compliance, CHP, and emission reduction measures and policies)? Explain how your recommendations satisfy any evaluation criteria you propose.**

AReM agrees with WPTF that the general criteria that should be used in developing the ARB program that will serve as the basis of regulating GHG emissions in the California energy sectors are the following:

- **Long-term cost effectiveness:** Any program should get the most GHG reductions for the least amount of cost to the economy and electricity ratepayers.
- **Consistency with eventual federal program:** A California based regulatory program should be designed to easily integrate with any eventual federal program, to promote harmonization, ease of use and elimination of redundant characteristics.
- **Equitable for all market participants, including affected load-serving entities (“LSEs”):** Regulating green house gas and the attendant market structures should allow all participants to access credits, offsets and economic incentives equally. Costs should be born only by those consumers who derive the benefits of regulations imposed on their LSES, and cost shifting among LSEs or customers should be avoided.
- **Compatible with wholesale energy markets:** So as to provide seamless integration with the wholesale markets in which we are operating, the regulations that are imposed related to GHG emissions standards must accommodate the functioning markets and the way in which electricity is procured. If not properly integrated, the interference could disrupt the market and its transactions.
- **Clear and simple processes to promote certainty in the market:** To the maximum extent possible, regulations should be free of unnecessary complications and gimmickry and provide roadmaps to compliance with clear delineation of the consequences for failing to meet regulatory responsibilities.
- **Flexibility:** Regulations should be flexible enough to deal with variability in emissions levels and demand for allowances from year to year.

**5/13/08 Ruling, Q11:**

**Address any interactions among issues that you believe the Commissions should take into account in developing recommendations to ARB.**

AReM would ask the Commission to consider the policy impacts of maintaining an appropriate balance of the attributes of renewable energy in both Greenhouse Gas Emissions Reductions Programs and the Renewable Portfolio Standard. Renewable energy and Renewable Energy Credits (“RECs”) and any credits that are created for reducing green house gas emissions from renewable generating facilities may have multiple impacts in a compliance market, as well as the voluntary markets, for renewable energy and greenhouse gas/carbon reductions. ESPs may in the future utilize RECs to meet the ambitious renewable portfolio standard goals established by the Legislature. Additionally the carbon attributes associated with RECs may in the future be used for the purpose of reducing GHG emissions through offsets, as is done in other compliance and voluntary carbon markets. AReM believes that it would be a more efficient and cost effective policy to maintain an association between renewable energy/RECs for the RPS and GHG reduction credits.

**ALLOCATION ISSUES**

**4/16/08 Ruling, Q8:**

**The staff paper describes an option that would allocate emission allowances directly to retail providers. If you believe that such an approach warrants consideration, please describe in detail how such an approach would work, and its potential advantages or disadvantages relative to other options described in the staff paper. Address any legal issues related to such an approach, as described in Questions 2 – 4 above.**

AREM does not believe that allowances should be given to retail providers under first deliverer point of regulation, as doing so could bestow an unfair competitive

advantage to utility-owned resources and would give too much allowance market power to large utilities. If the ARB determines to allocate some portion of allowance value for consumer benefit, that would be best and most equitably achieved by allocating revenue rights – not actual allowances – directly to retail providers in proportion to their share of load.

**4/16/08 Ruling, Q12:**

**If auction revenues are used to maintain affordable rates, should the revenues be used to lower retail providers' overall revenue requirements, returned to electricity consumers directly through a refund, used to provide targeted rate relief to low-income consumers, or used in some other manner?**

As a general comment, AReM believes fairness and equity dictate that all customers should have equal access to rebates, credits and other subsidies that are funded by revenues generated through auctions.

**FLEXIBLE COMPLIANCE MECHANISMS/COST-CONTAINMENT**

**5/6/08 Ruling, Q1(c):**

**Describe and specify how unique circumstances in the electricity market may warrant any special consideration in crafting flexible compliance policies for a multi-sector cap-and-trade program.**

Market participants are diverse and fill a variety of market needs that require recognition and when appropriate unique regulatory treatment to maximize the policy goal of reducing GHG emissions while maintaining a vibrant economy. As WPTF observes in its comments, flexible compliance mechanisms for the electricity sector are important given that it is subject to great deal of variability in annual emission levels due to weather and load conditions, and because a shortage of allowances in the sector could be detrimental to grid reliability.

**5/6/08 Ruling, Q5:**

**Should the market for GHG emission allowances and/or offsets be limited to entities with compliance obligations, or should other entities such as financial institutions, hedge funds, or private citizens be allowed to participate in the buying and selling of allowances and/or offsets? If non-obligated entities are allowed to participate in the market, should the trading rules differ for them? If so, how?**

AReM agrees with WPTF's position that market intermediaries should be allowed to participate in the emissions allowance market so as to reduce the transaction costs of trading and increase market liquidity. AReM further agrees with WPTF's position that concerns about unacceptable market behavior can be addressed through establishment of a market oversight body, and should not be attempted to control through barring these entities from the market.

**5/6/08 Ruling, Q7:**

**Should California create an independent oversight board for the GHG market? If so, what should its role be? Should it intervene in the market to manage the price of carbon? If such an oversight board were created, how would that affect your recommendations, e.g., would the oversight board obviate the need to include additional cost containment mechanisms and price-triggered safety valves in the market design?**

AReM agrees with WPTF's recommendation that a market oversight body with limited authority should be formed to monitor market conditions, compliance and verification, and to advise the Governor if intervention in the market is needed. In no event should the oversight body have the authority to establish policy or set the price of carbon credits by regulation.

**5/6/08 Ruling, Q8:**

**Should California accept all tradable units, i.e., GHG emission allowances and offsets, from other carbon trading programs? Such tradable units could include, e.g., certified Emission Reductions, Clean Development Mechanism (CDM) credits, and/or Joint Implementation credits.**

AReM agrees with WPTF's recommendation that the California cap-and-trade system should support eventual full linkage with other state and federal GHG trading systems (WCI, RGGI, Midwest), with the caveat that any linkage should be bilateral, rather than one-sided. AReM believes that California should not give high priority to linking with foreign and other international systems at this time, given that bilateral linkage is not currently possible. Any linkage with non-domestic systems would instead have to function as offsets.

**5/6/08 Ruling, Q21:**

**Should California allow offsets for AB 32 compliance purposes?**

AReM agrees with WPTF's position and recommendation concerning the use of real, verified offsets in the California and WCI cap and trade systems. As WPTF notes, consistency with an eventual federal program should be considered to be paramount; a situation where California allows unlimited offsets, and is later preempted by federal system that limits offsets, would be an undesirable outcome. AReM therefore urges California to be cognizant of the evolution of federal policy, and to revisit offset rules as needed to maintain consistency with a federal program.

**EMISSION CAPS/NON-MARKET-BASED MECHANISMS**

**5/13/08 Ruling, Q1:**

**What direct programmatic or regulatory emission reduction measures, in addition to current mandates in the areas of energy efficiency and renewables, should be included for the electricity and natural gas sectors in ARB's Assembly Bill (AB) 32 scoping plan?**

AReM strongly believes that programs for energy efficiency should continue to be administered by the IOUs with access to the programs open to all customers, including



those under direct access contracts. Funds and grants should be made available to all consumers, and any barriers to participation for direct access customers should be eliminated. Using a centralized administrator for all programs minimizes costs for customers and maximizes efficiency.

Respectfully submitted,

  
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**ALLIANCE FOR RETAIL ENERGY MARKETS**

June 2, 2008

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the *Comments of the Alliance for Retail Energy Markets on Design of Greenhouse Gas Regulatory Strategies* on all parties of record in proceeding ***R.06-04-009*** by serving an electronic copy on their email addresses of record and by mailing a properly addressed copy by first-class mail with postage prepaid to each party for whom an email address is not available.

Executed on June 2, 2008, at Woodland Hills, California.

  
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Michelle Dangott

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