

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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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)

**COMMENTS OF THE CALIFORNIA WIND ENERGY ASSOCIATION AND THE
LARGE-SCALE SOLAR ASSOCIATION
ON GREENHOUSE GAS REGULATORY STRATEGIES
FOR THE ELECTRICITY AND NATURAL GAS SECTORS**

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June 2, 2008

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I. INTRODUCTION

Pursuant to the Administrative Law Judges' Rulings issued on April 16 and April 22, 2008, and consistent with the California Public Utilities Commission's Rules of Practice and Procedure 1.9 and 1.10, and with Resolution ALJ-188, the California Wind Energy Association ("CalWEA") and the Large-scale Solar Association ("LSA") respectfully submit these comments addressing greenhouse gas ("GHG") regulatory strategies for the electricity and natural gas sectors. CalWEA's and LSA's comments focus, in particular, on whether the Public Utilities Commission and the Energy Commission should recommend adopting a specific renewable energy requirement.

Increased renewable energy requirements would employ an already-established, readily implementable and verifiable means to achieve a substantial proportion of California's GHG goals. While reducing our carbon footprint, increased renewable energy requirements would simultaneously provide the energy needed to return our economy to vibrancy, produce sustainable jobs, and contribute to the tax base. In addition, renewable energy requirements offer important "co-benefits" in pollution reduction beyond their contributions to the fight against climate change.

As renewables provide a wide array of benefits, their costs must be considered in light of their overall value, and not simply on a carbon basis. Indeed, the established regulatory regime for renewables does exactly that; the Public Utilities Commission, as discussed below,

comprehensively oversees the reasonableness of all renewables costs by assessing their energy value, their GHG contribution, and their co-benefits. The cost of renewables as a carbon-reduction tool, after their energy and other co-benefits values are subtracted, could be minimal or even negative depending on events over the next decade; continuing regulatory cost-control oversight will ensure that it remains cost-effective as future conditions develop.

A comprehensive approach to renewables is fundamentally important if they are to play a significant part in GHG reduction. Renewables are a capital-intensive industry with long-term planning needs, both for the facilities themselves and the transmission infrastructure necessary to support them. It is unrealistic to expect the substantial investment needed for renewables to exceed the current 20% target based on a brand new pricing signal from a yet-to-be established cap-and-trade system, which, based on the experience of other markets, is certain to be somewhat volatile in its fledgling years. A strong commitment to a set renewables percentage is necessary to spur this investment, although, as is the case today, reasonable cost controls must be an integral part of that commitment. Continued RPS-specific cost-control measures, taking into consideration all of renewables' benefits, will not only ensure that costs are proportional to those overall benefits; they will also assure investors of the long-term stability and sustainability of the program. The Public Utilities Commission and the Energy Commission should therefore strongly recommend a specific renewable energy requirement as a swift, sure means of achieving carbon reductions with a highly favorable cost-benefit balance.

In these comments, CalWEA and LSA explain why establishing a 33%-by-2020 RPS as part of the ARB's Scoping Plan would (i) provide cost-controlled carbon reductions that convey benefits beyond those addressed through a carbon-only cap-and-trade program, and (ii) be reliably achieved through an established regulatory infrastructure while measures needed to support alternative carbon-reduction approaches are discussed, designed, approved and implemented. CalWEA and LSA also comment on how a portion of the proceeds from the auctioning of emission allowances could be used in conjunction with a 33%-by-2020 RPS.

II. DISCUSSION

A. The Joint Decision & Contribution of Renewable Energy Requirements

In March, the Public Utilities Commission and the Energy Commission adopted a joint decision¹ (“Joint Decision”) recommending that, in implementing AB 32, the Air Resources Board (“ARB”) adopt a mix of mandatory regulatory requirements for the electricity and natural gas sectors together with a cap-and-trade system for the electricity sector with some auctioning of emission allowances. Since that time, a number of workshops were held to consider remaining policy issues for the electricity and natural gas sectors, including a May 2 workshop covering the topic of renewable energy and related transmission issues, among other issues.

In the Joint Decision, the two Commissions concluded that all retail electricity providers (including Investor-Owned Utilities (“IOUs”), Publicly-Owned Utilities (“POUs”), Electric Service Providers (“ESPs”), and Community Choice Aggregators (“CCAs”)) should be required to go beyond the current 20% Renewables Portfolio Standard (“RPS”) requirement, rejecting the suggestion of some parties that renewable energy requirements should be replaced by an AB 32 cap. The Commissions left the exact percentage requirements or deadlines open for consideration, however, pending further analysis. (Joint Decision at p. 4.)

The Joint Decision recommends that the Energy Commission, the Public Utilities Commission, and the ARB jointly seek legislation “that requires retail electricity providers to obtain a greater proportion of their power from renewables by a date certain, with flexibility to allow the Public Utilities Commission and/or ARB to require exceeding that level under certain conditions (subject to a cost-effectiveness evaluation, for example).” (Joint Decision at p. 35.)

The Joint Decision explained further that mandatory regulatory programs must be used *in tandem* with cap-and-trade, particularly in initial years as the cap-and-trade program is developed and tested in the complex, multi-sector environment:

While we fundamentally favor a certain minimum level of mandatory reductions from existing programs ...[such as the RPS], a cap-and-trade system in combination with these mandatory reductions should be able to produce the GHG emissions reductions required by AB 32 at a lower cost than sole reliance on additional mandatory reductions. ... The additional

¹ Public Utilities Commission Decision D.08-03-018 (adopted March 13, 2008) and Energy Commission Interim Decision CEC-100-2008-002-F (adopted March 12, 2008), respectively.

reductions due to a cap-and-trade system from the electricity sector will likely be small beginning in 2012, but may expand as experience with the mechanism and compliance obligations increase over the AB 32 time period. ... This opportunity to gain experience with the cap-and-trade mechanism, in addition to finding real least-cost reductions, is a major reason for our recommendation to proceed now with cap-and-trade for the electricity sector. (Joint Decision at p. 39.)

The Commissions have thus clearly recognized the advantage for carbon reduction of pairing mandatory regulatory programs with market-based measures, particularly during the developmental stages of the market-based approaches. Renewables, with their significant long-term investment and planning needs, are best suited for the mandatory regulatory approaches, at least until such time as the market-based approaches have achieved a robust, steady state sufficient to foster infrastructure planning and development.

**B. All Renewables Costs— Including Carbon Reduction Costs—
are Kept Reasonable by the Public Utilities Commission in a
Comprehensive Fashion**

Renewables, unlike many other carbon emission-reduction strategies, are engines for producing valuable products needed for a healthy economy—*i.e.*, the products collectively referred to as energy.² In addition, renewables produce other economic and environmental benefits. Renewables' carbon-reduction function is thus only one of many values that renewables provide; to isolate the cost of their carbon-reduction function, the value of those other benefits must first be subtracted from renewables' total costs. Under the current regulatory paradigm, the reasonableness of renewables' total costs is comprehensively assessed by the Public Utilities Commission through evaluation of three categories of "products": the reasonable cost for the greenhouse gas reduction function is modeled through a greenhouse gas ("GHG") "adder";³ the reasonable cost for energy products is modeled by the Market Price Referent ("MPR"), less the greenhouse gas adder;⁴ and the reasonable cost for co-benefits is now

² For purposes of this discussion, energy is treated as a single product, although in reality it consists of energy, capacity and ancillary services.

³ In Decision D.07-09-024, the Public Utilities Commission adopted the use of a temporary GHG adder in calculating the 2007 MPR, as a proxy for the cost of the GHG allowances that the MPR proxy gas plant would need to purchase under AB 32. The Commission directed further that consideration be given to the GHG adder in the 2008 MPR and later years; accordingly, the GHG adder component of the 2008 MPR is presently being evaluated in Rulemaking 06-02-012.

⁴ The MPR represents the market cost of energy, which the Commission has determined, at present, to be based on the costs of a proxy natural gas-fired combined-cycle turbine. Time of Delivery ("TOD") factors are applied to the MPR to produce a market price for different products including baseload, peaking, and as-available output.

addressed through the Above-Market Funds (“AMFs”).⁵ This regulatory paradigm, under existing Public Utilities Commission’s jurisdiction, assures that the RPS will be both cost-effective and just and reasonable not only for carbon reduction, but as a means of producing energy and co-benefits.⁶ To determine the reasonable cost of renewables as a carbon-reduction tool relative to other alternatives, only the greenhouse gas adder should be considered; the remainder of renewables’ values should be viewed as bearing their own costs.

Since renewables will be subject to regulatory oversight to ensure that they remain cost-effective on an overall basis, the renewables target should be based on potential feasibility, rather than on a projection from models that cannot be relied upon to predict the overall future costs and values associated with renewables (indeed, as shown in the Section VI, the E3 model dramatically undervalues energy and thus overestimates the cost of renewables).

C. Renewables Require Long-Term Investments, Planning & Stability, and Promise a Return of Expedited, Enhanced Carbon Reductions

The current 20% RPS target has created substantial new development activity – to wit, many national and international development companies that were not active in California prior to the passage of SB 1078 in 2002 are now actively developing projects in and around the state. The RPS program has produced contracts for thousands of megawatts of capacity from a diverse set of technologies with reputable developers, a substantial mark of success that promises more to come.

Some question the success of RPS, as relatively few projects have been built thus far. The most significant barriers to expedited construction, however, are transmission and land-use policies, which continue to be addressed through focused efforts such as the Renewable Energy Transmission Initiative. Developers have thus far been willing to undertake the difficulties and substantial costs associated with these transmission and land-use issues due to the strength of California’s commitment to the 20% renewable energy goal. In other words, it has only been California’s commitment to a set percentage of renewable energy that has provided developers

⁵ The AMFs supersede the “supplemental energy payments” that previously derived from the “Public Goods Charge” – a line-item charge on utility bills. The AMFs derive directly from utility consumers and are tracked by the IOUs and the Public Utilities Commission.

⁶ The Public Utilities Commission’s ongoing jurisdiction provides assurance that reasonable renewables costs will keep pace—whether upwards or downwards—as the value of the products they provide change. Under the current paradigm, for example, the Public Utilities Commission revisits the MPR annually, adjusting its value in accordance with the market price of energy.

with confidence that a market will exist for their products at a price that will reward their investment and their efforts to overcome current obstacles.

As California's firm commitment is needed to spur renewables development, renewables should be thought of as a foundation to which other carbon-reduction strategies will be added, rather than as an element that should compete for revenues in a cap-and-trade paradigm. The pricing signals sent by cap-and-trade cannot be expected to incent developers to overcome the transmission and land use issues facing renewables today, let alone to drive the long-term capital investments required for significant energy production. Capital investments in energy production, especially after the boom-and-bust California has experienced the energy sector, presently require long-term commitments; although energy market pricing signals may someday provide sufficient stimulus for merchant investment, those market signals cannot be expected to drive capital-intensive investment until they are proven to be robust, stable and reasonably predictable.⁷ It will take some time after cap-and-trade has been established before the market will venture to invest on its strength.

Due to the capital intensity and long-term planning needs of renewables, the theoretical contribution that renewables could provide over the current 20% requirement simply will not become a reality in time to contribute to the 2020 goal if cap-and-trade revenues are driver for renewables development, rather than a set renewables percentage. . Renewables require considerable lead time, as does the associated transmission development needed to deliver renewable energy (as discussed in the next section). Under a scenario in which renewables development above 20% is dependent on cap-and-trade revenues, renewables development would not even begin to any significant degree until after a cap-and-trade program has become mature enough to support investment—likely years after the program has been designed, approved, and first implemented.

Recognizing the need to address renewables outside of the cap-and-trade framework, at least until cap-and-trade has reached maturity, will have an additional and substantial benefit: it will diversify the “portfolio” of carbon-reduction incentives, ensuring that fluctuations in carbon-trading pricing, which can be expected based on the experience of other such programs, do not

⁷ For detailed discussions of the limitations of short-term market pricing signals in stimulating new energy resource development and the long-term certainty needed for such investment, see “California Public Utilities Commission Staff Recommendations on Capacity Market Structure: A Report on the August 2007 Workshops in Collaboration with the CAISO,” (Jan. 2008) (issued in Public Utilities Commission Docket No. R.05-12-013), *available at* http://docs.cpuc.ca.gov/word_pdf/REPORT/77949.pdf.

undermine the progress needed to achieve carbon-reduction goals. As discussed above, renewables would be assured to be cost-effective under a regulatory oversight program that comprehensively considers *all* of the products renewables provide-- energy, GHG and RPS co-benefits. To the extent that the achievable quantity of cost-effective renewables exceeds the amount that carbon-focused modeling would predict, the “extra” renewables would provide, at worst, a margin of error for other efforts intended to achieve AB 32 goals and, at best, would achieve earlier or greater carbon reductions over the targets, all at a price that is just and reasonable considering everything that the RPS provides to California. This would be an excellent outcome in the face of the threat of climate change, and would pave the way toward achieving the AB 32 goals for 2050. Therefore, the Commissions can confidently recommend to the ARB that it adopt a 33%-by-2020 RPS as one of the core measures of the AB 32 Scoping Plan.

D. An Express 33% RPS Target is Necessary to Drive the Transmission Expansion California Needs to Achieve a 33% RPS Goal

As important as an express 33% RPS target is to renewable project development, it is perhaps even more so as a driver for the transmission planning and build-out needed to deliver of that renewable energy. Even with the 20% RPS goal having been established five years ago, the state is still substantially lagging in planning for— let alone building— the necessary transmission infrastructure for that smaller quantity of renewable energy. If an express 33% RPS target is not established, there is every reason to be pessimistic that the 33% RPS goal could be achieved, due to lack of supporting transmission— regardless of whether that much new renewable procurement is necessary to achieve AB 32 goals (as was indicated in the 2006 Climate Action Team Report to the Governor and Legislature).⁸

Under the reformed generation interconnection and transmission planning process that the CAISO is now undertaking to design, developers will be required to post very substantial deposits to obtain transmission cost studies and upon signing an interconnection agreement to obtain the necessary transmission upgrades. Given the five to seven years’ lead time that it takes to plan, permit and construct transmission, much of the planning and deposits must be accomplished within the next few years in order to achieve the 33% RPS target over the next

⁸ Available at http://www.climatechange.ca.gov/climate_action_team/index.html.

decade.⁹ Without signed long-term power purchase agreements or the strong prospect of such, developers will not make the quantity of investments needed to achieve a 33% goal, and the necessary transmission upgrades will not be made. Thus, to achieve the renewables level that will be required to attain the AB 32 goals, it will be necessary to establish a 33%-by-2020 RPS target as a “core measure” of the ARB Scoping Plan this year. Waiting for a cap-and-trade program to become sufficiently robust to support investment will push additional renewables investment and the transmission infrastructure needed to support it too far into the future to contribute to the 2020 AB 32 goals.

E. The E3 Model Misstates Renewables’ Value, Overstating the Cost of a 33% Target

CalWEA and LSA have conducted a detailed review of the E3 calculator used to model the 33% RPS scenario. The conclusions of the E3 calculator appear to be in error, in significant part due to faulty assumptions on the relative costs of gas-fired and renewable generation. CalWEA and LSA are confident that, far from the relatively high cost per metric ton (“tonne”) predicted by the E3 model for a 33% RPS, the carbon reduction component of RPS costs may well approach zero— and could possibly even become negative; in other words, the carbon reduction may come at no additional cost, and may even save money relative to gas-fired generation.

The E3 model shows a large margin between renewable resource costs and the alternative costs of gas-fired generation. In the 33% RPS case, the incremental costs for renewable resources are \$135 per MWh. In comparison, the model assumes gas-fired power is available for about half that price, \$69 per MWh. Such a large difference in costs is not reasonable, and is the product of erroneous assumptions.

⁹ The 2007 CEC Intermittency Analysis Project (“IAP”) report found that there is sufficient flexible capacity on the California grid to accommodate 33% renewables, but that this capability is not necessarily being used. Note that establishing an express 33% RPS target will put greater emphasis on the need to plan the rest of the system accordingly – e.g., deterring utility commitments to fossil fuel resources that will be unnecessary with 33% renewables, and optimizing the use of existing system resources (including hydro, pumped hydro storage, and dispatchable fossil fuel resources as well as some large loads), allowing for optimized renewable resource integration that can reduce both the carbon footprint and the cost of the energy system.

Table 1: E3 Model Assumed Renewable Costs in 2008 \$ (\$/MWh)

	Fixed Cost	Variable	Transmission	Total
Renewables	\$109	\$14	\$12	\$135
Gas-fired	\$15	\$54	\$0	\$69
Difference				\$66

CalWEA and LSA first note that, if the average price of a new renewable resource were equal to the cost of incremental gas-fired generation, as measured by the all-in costs of the combined-cycle gas turbine (“CCGT”) plant that is the basis for the Public Utilities Commission’s MPR, there would be *no* additional costs for renewable resources, and the cost per tonne for GHG reductions from incremental renewables would thus equal zero (*i.e.*, their energy products would be provided carbon-free, at no additional cost). CalWEA and LSA show below the adopted 2007 MPR for a 20-year contract starting in 2008, excluding the GHG adder, in comparison to the same renewable costs. All costs are in 2008 dollars. The difference is then \$44 per MWh, which is 33% lower than the E3 calculation. This comparison strongly suggests that the E3 calculator exaggerates the cost difference between renewable and gas-fired resources.

Table 2: E3 Model Assumed Renewable Costs vs. the 2007 MPR, in 2008 \$ (\$/MWh)

	Fixed Cost	Variable	Transmission	Total
Renewables	\$109	\$14	\$12	\$135
Gas-fired (2007 MPR)	\$27	\$65	\$0	\$91
Difference				\$44

CalWEA and LSA’s review has identified the following problems with E3's calculator:

- **Starting natural gas price.** Natural gas prices today are above \$10 per MMBtu at the California border. E3 uses a gas price of \$7.85 per MMBtu for the cost of fuel. If the cost of gas is increased to \$10 per MMBtu, the cost of GHG reductions from a 33% RPS decreases from \$133 to \$106 per tonne.
- **Constant real cost of fossil fuel.** The E3 model uses a constant real cost of natural gas (\$7.85 per MMBtu) for the entire 2008 – 2020 period. The capital costs for new generation also are expressed in constant 2008 dollars. These assumptions do not consider the likelihood that natural gas prices and generation capital costs will escalate at

significantly different rates. In the 18 years since 1989, natural gas prices at the California border have escalated by 6.4% per year, while general inflation has averaged 2.9%.⁶ In the long-run, fossil fuel prices can be expected to exhibit a positive real escalation rate, as they become increasingly difficult to find and produce. In addition, the structure of the E3 model does not recognize the potential for renewable resource costs to decline over time, as renewable technologies improve. These differential escalation rates become particularly significant over the multi-decade timeframe in which the GHG reduction program will operate. *Indeed, one of the primary benefits of renewables is that they substitute capital costs for fuel costs, and are a long-term hedge against future fuel price escalation.* The E3 model's use of constant, 2008 dollar costs in all years ignores these significant benefits of renewables. CalWEA and LSA have re-run the E3 calculator, assuming that a natural gas price of \$10 per MMBtu in 2008 increases at the historical long-term real escalation rate of 3.5%; using this rate, the natural gas price would exceed \$15 per MMBtu in 2020. This change in the profile of natural gas prices used in the E3 calculator results in a GHG mitigation cost for a 33% RPS of \$43 per ton.

- **Too-low market heat rates and electricity market prices that are inconsistent with the MPR methodology.** The electricity market prices used in the model average \$54 per MWh. Assuming variable O&M of \$2.50 per MWh in the market price and dividing the remainder by the gas price results in a market heat rate of approximately 6,600 Btu/kWh. This is 5% below the “clean & new” heat rate of a new CCGT, and is inconsistent with typical market heat rates of 8,000 Btu per kWh observed in the California wholesale market in recent years— and thus with the assumptions underlying the Public Utilities Commission's MPR, which is based on a new CCGT. CalWEA and LSA used a market heat rate of 8,000 Btu per kWh to re-calculate electric market prices in the E3 calculator. This change, plus the gas price scenario described above (\$10 per MMBtu in 2008; \$15 per MMBtu in 2020), reduced the GHG mitigation cost for a 33% RPS to a *negative* \$11 per ton— i.e., renewables would provide carbon reductions at an overall cost savings, not at any additional expense.
- **Avoided capacity costs fail to consider renewables longevity.** The E3 model shows that a 33% RPS will not just avoid new CCGTs, but that the added renewable capacity also will displace existing CCGT capacity. The model thus limits the capacity costs that renewables avoid because 76% of the displaced CCGTs in 2020 are assumed to be existing units. However, the model ends in 2020, and the renewable capacity added between 2008 - 2020 will operate for 30 years. Even if new renewables initially displace existing generation, over time they will displace other new generation that would have been needed as loads grow. As a result, the E3 model's calculation of the capacity costs avoided by a 33% RPS is understated. This is a structural failure of the E3 calculator that cannot be remedied simply by changing input assumptions, but that artificially inflates the perceived cost of a 33% renewables scenario.

⁶ In 1989, southern California border natural gas prices averaged \$2.11 per MMBtu; in 2007 they averaged \$6.42 per MMBtu. General inflation is based on the GDP price deflator.

- **Transmission cost estimates are too high and are not properly allocated.** The assumed transmission cost difference between gas-fired and renewable resources is inappropriately inflated. While gas-fired resources may be located closer to load centers than some renewable resources, it is improper— and unfair— to look at transmission only on the renewable side. In addition, transmission built to bring renewable power to market will have network benefits as a result of eliminating existing and future congestion within California and increasing the state’s capacity to import power. For example, the 4,500 MW Tehachapi transmission project will relieve north-south transmission constraints on Path 26. Thus, at a minimum, transmission cost adders should be net of system benefits and of transmission upgrades for gas-fired generation. Finally, the model allocates transmission costs to renewables only in the 33% RPS case; such costs also should be allocated to the reference case – it is improper to allocate the entire cost of transmission on renewables to the 33% case. These are again structural failures of the E3 calculator that cannot be remedied simply by changing input assumptions, but that artificially inflate the perceived cost of a 33% renewables scenario.

CalWEA and LSE appreciate E3’s candid comment, on Slide 27 of its May 6 workshop presentation, that its GHG calculator “should not be used for resource planning decisions.” The deficiencies noted above simply reinforce this point. Clearly, the Commissions should first recognize that re-running the E3 calculator with more appropriate assumptions results in a *negative* cost for the renewables’ carbon-reduction function— *before* accounting for the other errors that would require reprogramming the model. The Commissions, following the E3 caveat and in light of these concerns, should not look to the E3 model in making a determination on the appropriate percentage of renewables, but should rather select the maximum feasible renewables contribution conditioned on the continued regulatory cost control measures that will ensure renewables remain cost-effective overall.

**F. The Co-Benefits of Renewables Can Be Reflected in the
“Above-Market Fund,” Which Could be Supplied by a
Portion of Auction Revenues [Responds to ALJ Questions 10
& 11]**

AB 32 requires the ARB to adopt regulations “to achieve the maximum technologically feasible and cost-effective reductions in greenhouse gas emissions,” and further requires the ARB to consider the “co-benefits” of regulation. These co-benefits include the “overall societal benefits including reductions in other air pollutants, diversification of energy sources and other economic, environmental and public health benefits.”¹⁰

¹⁰ Health and Safety Code § 38562(b)(6).

Renewables provide a variety of co-benefits, including, but not limited to, the avoided security and environmental risks of LNG shipment and import infrastructure; avoided environmental impacts and fossil fuel use associated with the extraction, production and transportation of fossil fuels; reduction in air, water, and solid waste emissions relative to fossil-fuel powered energy plants;¹¹ health benefits, and rural economic development benefits. The cost of those benefits can be provided through AMFs, to the extent that they are paid for and not already incorporated, under the current regulatory paradigm, in the MPR.¹² Presently, the AMF derives from ratepayers as the utilities pass along the above-market costs of RPS contracts. In the Joint Decision, one of the two methods for returning revenues from allowance auctions to benefit electricity consumers identified by the Commission was the augmentation of investments in energy efficiency and renewable power. Using auction revenues to either supply all or a portion of the AMFs would benefit ratepayers through offsetting the charges that they would otherwise pay for these valuable benefits.

G. Establishing a 33%-by-2020 RPS Is Consistent with the ARB's Priorities

At the May 19, 2008, Scoping Plan Workshop, the ARB identified criteria for crafting a “preferred approach” to its Scoping Plan.¹³ Establishing a 33% RPS will meet a number of these criteria:

- **Meet the Key Scoping Plan Objectives:**
 - **Achieve the target for 2020.** Establishing a 33%-by-2020 express RPS target now will promote the development of whatever amount of renewables prove to be cost-effective, and the transmission needed to support it. Unlike cap-and-trade, the RPS program is already established and functioning smoothly (although additional work will be required to apply RPS equally to the POUs).

¹¹ Although the MPR reflects the cost of a gas plant that uses SCR technology and purchases offsets for those air emissions for which offsets are available, it does not address environmental and/or health impacts from remaining emissions, including those not currently or fully regulated.

¹² See n.11, supra. Note also that the MPR is time-differentiated to account for the value of power during peak periods. We believe that some of these factors are significantly under-valued in the current MPR, and that PG&E's TOD factors are too low. These factors should be fully valued in the MPR methodology rather than be accounted for through AMFs.

¹³ See http://www.arb.ca.gov/cc/scopingplan/meetings/051908/5_19_spwrkshop_slides_am.pdf.

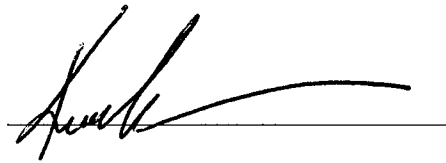
- **Maximize economic benefits and minimize economic harm.** Along with energy and capacity to support the state's economic activity, promoting renewables will bring jobs and tax base to the state and its rural communities.
 - **Maximize societal benefits, including environmental and public health co-benefits.** Replacing fossil-fueled energy production with renewable generation will provide a wide array of environmental, public health and economic benefits, as discussed above.
 - **Assure that emissions reductions required of each sector are equitable.** Establishing a 33% RPS will increase the likelihood that the electric sector is achieving its full, cost-effective potential for emissions reduction.
 - **Provide leadership and influence other Governments.** More than 20 other states have established RPS requirements, including most of the WECC states, as do many other countries. Raising the goal as part of achieving GHG targets will encourage these states, and the world, to follow California's lead and adopt yet another suite of California-developed technologies.
- **Consider additional factors, such as:**
 - **Ability to enforce reductions.** RPS compliance is readily verifiable and enforceable upon IOUs, ESPs and CCAs by the Public Utilities Commission. The Energy Commission must be given similar authority over the POUs.
 - **Durability and flexibility in program implementation.** The RPS contains established flexibility provisions— both energy delivery and compliance timing flexibility— and is likely to be made more flexible through unbundled tradable Renewable Energy Credits ("RECs"). The combination of a firm target, qualified only by continued cost-effectiveness oversight, provides the strength of commitment needed for development while remaining sufficiently flexible to ensure costs remain manageable and appropriate to the benefits received.

III. CONCLUSION

The renewables contribution needed to attain the AB32 2020 goals can only be obtained through a firm, 33% RPS-by-2020 commitment. The ongoing regulatory oversight to ensure that renewables are cost-effective, considering all of the products and benefits they convey, is the appropriate counterbalance to that firm commitment. The combination of a set percentage and regulatory cost oversight is a far better fit to the long-term capital-intensive investment needed for renewable development than a fledgling cap-and-trade program, which simply cannot be expected to provide the necessary incentives for renewable development. By building on the

increasing success of the RPS program to date, a 33% RPS-by-2020 commitment will provide a firm cornerstone of California's carbon reduction program, allowing for a greater degree of flexibility and experimentation in the cap-and-trade component and ultimately a stronger and more reliable carbon reduction program overall.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Nancy Rader', is written over a horizontal line.

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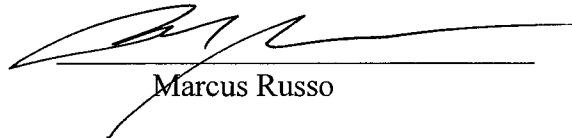
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**COMMENTS OF THE CALIFORNIA WIND ENERGY ASSOCIATION AND THE
LARGE-SCALE SOLAR ASSOCIATION ON GREENHOUSE GAS REGULATORY
STRATEGIES FOR THE ELECTRICITY AND NATURAL GAS SECTORS**

on all known parties to R.06-04-009 (as well as by email under CEC Docket No. 07-OIIP-01 to docket@energy.state.ca.us and kgriffin@energy.state.ca.us) by sending a copy via electronic mail and by mailing a properly addressed copy by first-class mail with postage prepaid to each party named in the official service list without an electronic mail address.

Executed on June 2, 2008, at San Francisco, California.



Marcus Russo



California Public Utilities Commission

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