BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement the	)	
Commission's Procurement Incentive Framework	)	Rulemaking 06-04-009
And to Examine the Integration of Greenhouse Gas	)	(Filed April 13, 2006)
Emissions Standards into Procurement Policies	)	

ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION
OF THE STATE OF CALIFORNIA

In the Matter of: Order Instituting	)	
Informational Proceeding on a	)	Docket 07-OIIP-01
Greenhouse Gas Emissions Cap	)	

REPLY COMMENTS OF THE MODESTO IRRIGATION DISTRICT ON EMISSION REDUCTION MEASURES, MODELING RESULTS, AND OTHER ISSUES

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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)

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In accordance with Rules of Practice and Procedure of the Public Utilities Commission of the State of California ("CPUC"), and the Administrative Law Judges' Rulings soliciting comments, establishing an outline and setting the schedule for filing[1], the Modesto Irrigation District ("Modesto ID") hereby files these Reply Comments on certain issues related to the scoping plan for implementation of Assembly Bill (AB) 32 greenhouse gas ("GHG") reductions, including allowance allocation, flexible compliance and non-market based emission reduction measures. Modesto ID also files these Reply Comments with the California Energy Commission ("CEC") in Docket 07-OIIP-01.[2]

[1] The Assigned ALJs have issued a series of applicable Rulings, including: Administrative Law Judges' Ruling Updating Proceeding Schedule and Requesting Comments on Emission Allowance Allocation Policies and Other Issues dated April 16, 2008; Administrative Law Judges' Ruling Providing Notice of Joint Workshop on Emission Reduction Measures and Opportunity to Provide Comment on Workshop Issues dated April 22, 2008; Administrative Law Judges' Ruling Requesting Comments on Flexible Compliance Policies dated May 6, 2008; Administrative Law Judges' Ruling Requesting Comments on Emission Reduction Measures, Modeling Results, and Other Issues; Incorporating Materials into the Record; and Recommending Outline for Comments dated May 13, 2008; and, Administrative Law Judges' Ruling Modifying Schedule and Correcting Suggested Outline for Comments and Reply Comments dated May 20, 2008.

[2] The CPUC and the CEC may hereinafter jointly be referred to as the "Joint Agencies."

I. Summary

Almost all comments recognized the impact any emission reduction program design will have on end-use consumers and potentially on California's economy. Modesto ID concurs with parties that urge the Joint Agencies to recommend program measures to address those cost impacts: set clear goals to achieve the reductions mandated by AB 32 and provide a wide range of tools for achieving those goals. Each entity regulated under the program should be authorized to apply the combination of tools that best achieves cost effective reductions for its customer base.

Modesto ID also concurs with those comments that urge the Joint Agencies to move cautiously in formulating their program scope recommendations for the California Air Resources Board ("CARB"). A significant portion of emission reductions can and will be achieved through non-market measures, including renewable resource procurements and energy efficiency programs. Until sufficient data is obtained to allow accurate modeling of such reductions, the need for a market system, the extent of such need – if any, the type of system that would best address such need, and other fundamental design questions cannot be determined and it is premature to design a system to resolve such questions. To the extent non-market measures effectively reduce GHG emissions, a market system will is less likely to result in additional cost effective reductions.

The administrative and other costs of implementing a new emission allowance market system that will ultimately be borne by California consumers cannot be justified unless such new market system will achieve sufficient cost effective emission reductions beyond those achievable through feasibly implemented non-market measures. Modesto ID echoes the request of the Division of Ratepayer Advocates ("DRA") that "if the cap-and-trade component represents a very small portion of reductions, then ARB should investigate whether the administrative costs and burden are worth having a cap-and-trade at all."[3]

II. General Issues

III. Allowance Allocation

One of the main debates outlined by the comments is whether, if an emission allowance market is implemented, and allowances are allocated to capped entities in the electric sector, should they be allocated based on "output" or "historical emissions." Modesto ID believes that cost effective emission reductions would more probably occur with an administrative allocation of allowances based at least initially on historical emission levels. Opponents of this approach argue that emission based allocations will not recognize early actions or voluntary reductions, and in fact would encourage higher emissions. They suggest that entities with higher emissions have saved money by avoiding investments in more expensive lower emitting resources and that therefore their customers can afford to bear the cost of purchasing more allowances. Such argument equates to suggesting that customers of entities with higher emitting resources should be punished for prudent resource decisions made by their service providers. These arguments ignore the fact that output, or sales, based distribution methodologies provide allowances where none are needed to meet compliance obligations.

Output based allocations will indisputably result in windfalls to the largest utilities and wealth transfers between consumers of various utilities.[4] Such an approach will distort any market system. At a minimum a sound market system must provide time for entities that

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[3] Corrected Comments Of The Division Of Ratepayer Advocates On Electricity Sector Responsibility, Allowance Allocation, Flexible Compliance Mechanisms, And Modeling, p. 4.
[4] See, Southern California Public Power Authority Comprehensive Comments, p. 31 *et seq.* See also, e.g., Sacramento Municipal Utility District's Comments On Administrative Law Judge's Ruling Requesting Comments On Emission Allowance Allocation, Combined Heat And Power, And Flexible Compliance Policies, "Recognizing that a pure output-based allocation unfairly penalizes entities who are historically vested in high-carbon emitting facilities", p. 13.

invested in higher emitting resources before concerns with GHG emissions were surfaced to realign their portfolios without incurring prohibitive expenses to obtain large amounts of allowances at the same time they are funding projects to replace high emitting resources. The purchase of allowances cannot supplant the true goal of AB 32 which is to eliminate emissions.[5]

Early actions and voluntary reductions will be recognized and result in significant cost savings no matter how allocations are distributed. Those entities that invested in early actions and voluntary reductions will have lower emission profiles. They will require fewer allowances and will need to make less investment in reduction activities in order to meet their reduction goals - two distinct areas of cost savings. Moreover, they can obtain additional benefit from further cost effective reductions they achieve going forward. Thus the value such entities receive from low and zero emitting resources obtained before reduction mandates are put in place multiplies as market prices respond to skyrocketing demand.

Comments also debate the propriety of allocating the value of emission allowances to retail providers rather than to all electric sector participants. Modesto ID believes that the value of allowances can be best utilized to accomplish the goals of AB 32, without overburdening consumers, through an allocation to retail providers. Emission reduction is most likely to be achieved through direct investments by retail providers in energy efficiency programs, new renewable projects, and the development of new low and zero emitting resources. Assigning the value of emission allowances to retail providers keeps the money available to those entities making the emission reductions. Opponents of allocating allowance value to retail providers

[5] For these reasons and others set forth in various sets of opening comments (see, e.g., Opening Comments Of The California Municipal Utilities Association On Recommended Greenhouse Gas Emission Reduction Policies, Northern California Power Agency Comments On Assigned Administrative Law Judges' Rulings And Staff Papers Regarding Recommendations To The California Air Resources Board For The Electricity Sector, and Southern California Public Power Authority Comprehensive Comments), Modesto ID also opposes auction of emission allowances.

argue that such a practice will discriminate against independent power providers and insulate consumers from the market costs of emissions. These arguments cannot be given weight.

Power producers will pass on their "emission costs" to retail providers through higher resources prices. Those higher prices ultimately are borne by the retail providers' consumers. Allocation of allowance value to the retail provider simply offsets this cost otherwise borne by consumers. This offset does not insulate the consumers from market price signals in any way that would have a negative impact on achieving the goals of AB 32. Rather it will achieve direct reductions and help prevent leakage by eliminating the need to forgo local products and resources in favor of cheaper unregulated ones. Fundamentally, no amount of allowance allocations will "hold the line" on the costs of emission reductions. By definition, there will never be sufficient allowances to cover all emissions, thus a designated amount of emissions will necessarily be reduced – at some cost. Consumers will bear an upward price glide; proper allocation methodologies will simply smooth out that glide path.

Modesto ID agrees with those comments that point out the necessity of designing sufficient flexibility into any emission reduction program to allow retail providers to meet their emission reduction obligations while still being able to supply sufficient power to keep the lights on. The Joint Agencies must analyze potential impacts to system reliability and resource availability before recommending any design element.[6]

Comments regarding the appropriate scope of a potential market system addressed the breadth of both market coverage and market participation. Modesto ID agrees with those parties that supported (1) a broad based scope under the cap, including multiple market sectors, each bearing their own proportionate share of reduction obligations and costs, and (2) allowing only

[6] See, e.g., Sacramento Municipal Utility District's Comments On Administrative Law Judge's Ruling Requesting Comments On Emission Allowance Allocation, Combined Heat And Power, And Flexible Compliance Policies, p. 4.

capped entities to participate in the trading market. Too narrow a scope could encourage leakage across sectors and too open a trading market could result in market manipulations such as hoarding and price gouging. Parties outside the capped sectors have advocated for a broader trading market. However, a broad sector based system covering many capped entities with only capped entities entitled to trade will achieve the reduced costs and market liquidity touted by those parties without endangering the integrity of the market itself.

Again, before recommending any market design, the Joint Agencies must develop a record to determine how much it will cost to administer such a market and who will bear those costs. If the Joint Agencies do recommend an emission allowance cap and trade market, it should be certain that it recommends a market design that does not detract funding available for investment in direct emission reductions.

Some parties point out that an enforcement mechanism may be necessary to ensure regulated entities comply with their reduction obligations. Modesto ID believes that any enforcement mechanisms must allow sufficient flexibility to ensure that capped entities are not forced to choose between shutting off power or violating their cap. Any enforcement program should be phased in to allow entities sufficient time to replace their higher emitting resources. Safety valves must address situations where all available feasible reduction activities have been undertaken and sufficient allowances cannot be obtained. For example, exemptions may be appropriate where violation of cap obligations are due to market malfunctions, lagging technology development, or scarcity of transmission. Utilities should not be put in the same position as during the energy crisis, being forced to choose between violating federal tariffs or state mandates.

IV. Flexible Compliance

H. Offsets

Many parties suggest that if offsets are incorporated into a market system design for California they must be "additional." This constraint must be carefully defined before it is adopted. Modesto ID agrees that it is appropriate to limit offsets to those reductions that would not be required to meet a party's reduction obligations under the emissions cap or under any non-market mandate. Such formulation of "additional" encourages the development of projects that might not otherwise be developed as quickly, or at all. However, "additional" cannot be coterminous with "surplusage" as some commenters may suggest.

V. Treatment of CHP

VI. Non Market Based Emission Reduction Measures (Other than CHP) and Emission Caps

A. Electricity Emission Reduction Measures

As clearly noted in its opening comments, Modesto ID strongly believes that no additional or special legislation is required to encourage publicly owned utilities to bear their "fair share" of renewable procurement and energy efficiency goals in California. Modesto ID, like many other publicly owned utilities, already meets or exceeds existing mandates in both areas. Moreover, as has been repeatedly acknowledged, renewable procurement and energy efficiency will necessarily be a large part of every utility's AB 32 compliance plan. The Joint Agencies must focus on developing recommendations for sector and utility specific reduction goals so that real progress can be made designing a complete program to meet those goals.

There is not any single solution or miracle mix of reduction measures that will accomplish cost effective reductions for every utility.[7] An effective emission reduction program will identify broad goals without dictating the methods or manner required for achieving those goals. Each utility must have the autonomy to achieve its quota of emission reductions in the manner most cost effective for its consumers. Modesto ID agrees that if utilities are given the obligation to reduce emissions they must also be given the freedom to choose the methods for reducing emissions.[8]

Many parties have advocated increasing renewable procurement mandates to 33%. Modesto ID cautions the Joint Agencies from recommending mandates that will strain available resources and endanger grid reliability. Parties have recognized the significant hurdles utilities currently face in achieving expanded energy efficiency goals; parties must also acknowledge that similar barriers exist for renewable procurement. These hurdles include increased demand for limited existing resources, strictures on development of new local projects, limitations of existing technologies, and transmission access restraints. Sufficient time must be allotted to overtake these hurdles before new, more stringent mandates are considered.

VII. Modeling Issues

C. Results Reported by E3

Modesto ID agrees with comments pointing out that the modeling provided by E3 is not sufficient to rely on to make recommendations for a $6 billion (plus or minus) program design. As was observed in opening comments, the E3 model suffers from a "combination of faulty

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[7] See, e.g., Northern California Power Agency Comments On Assigned Administrative Law Judges' Rulings And Staff Papers Regarding Recommendations To The California Air Resources Board For The Electricity Sector, p. 39; Opening Comments Of The Los Angeles Department Of Water And Power On Policies Regarding Emission Alllowance Allocation, Flexible Compliance, Treatment Of Combined Heat & Power, Non-Market-Based Emission Reduction Measures And Emission Caps, And Greenhouse Gas Modeling Results, p. 4.

[8] Comments Of The Coalition Of California Utility Employees And California Unions For Reliable Energy On Greenhouse Gas Emission Allowance Allocation Methodologies And Other Matters, p. 5.

underlying assumptions and inherent limitations" that "counsel against heavy reliance on it" by the Joint Agencies.[9]

VIII. Conclusion

Modesto ID is fully committed to reducing its emission levels and meeting the goals of AB 32. It has participated in the Joint Agencies and CARB AB 32 program scoping proceedings and will continue to do so. Modesto ID believes that each utility is uniquely situated and the most effective emission reduction implementation program will establish an obtainable goal and provide a variety of tools for regulated entities to apply to their own circumstances and determine the best path for achieving reductions. If these tools include a market component that component should be only a single part of the bigger whole and must be carefully harmonized with existing mandates and legislative structures. As much certainty as possible must be built into the program to allow utilities to successfully plan and manage their resources to meet their service obligations.

Respectfully Submitted,

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[9] Comments Of The Independent Energy Producers Association On Emission Allowance Allocation, Flexible Compliance, And Combined Heat And Power, p. 44.

CERTIFICATE OF SERVICE

I, Linda Fischer, certify under penalty of perjury under the laws of the State of California that the following is true and correct:

On June 16, 2008, I served the attached:

REPLY COMMENTS OF THE MODESTO IRRIGATION DISTRICT ON EMISSION REDUCTION MEASURES, MODELING RESULTS, AND OTHER ISSUES

on the service list for R.06-04-009 by serving a copy of each party by electronic mail, or by mailing a properly addressed copy by first-class mail with postage prepaid to each party unable to accept service by electronic mail.

Copies were also sent by first-class mail with postage prepaid to Commissioner Peevey and Administrative Law Judges Charlotte F. TerKeurst and Jonathan Lakritz.

A copy was also sent by first-class mail with postage prepaid to the California Energy Commission, Docket Office, MS-4, Re: Docket No. 07-OIIP-01, 1516 Ninth Street, Sacramento, CA 95814-5512.

Copies were also submitted by email to the CEC docket office at docket@energy.state.ca.us and to project manager Karen Griffin at kgriffin@energy.state.ca.us.

A copy of the service list is attached hereto.

Executed on June 16, 2008, at Modesto, California.

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