

**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.

R. 06-04-009

BEFORE THE CALIFORNIA ENERGY COMMISSION

AB 32 Implementation – Greenhouse Gas
Emissions.

Docket 07-OIIP-01

**COMMENTS OF THE WESTERN POWER TRADING FORUM
AND THE ALLIANCE FOR RETAIL ENERGY MARKETS
ON THE PROPOSED DECISION ON GREENHOUSE
GAS REGULATORY STRATEGIES**

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In accordance with Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission ("CPUC"), the Western Power Trading Forum¹ ("WPTF") and the Alliance for Retail Energy Markets² ("AReM") respectfully submit these joint comments on the Proposed Decision of Commissioner Michael R. Peevey, "Final Opinion on Greenhouse Gas Regulatory Strategies," dated September 12, 2008 ("Proposed Decision" or "PD").

¹ WPTF is a California non-profit, mutual benefit corporation. The membership of WPTF includes energy service providers, scheduling coordinators, generators, energy consultants and public utilities, all of which are active participants in the restructured California electricity market and elsewhere in the West.

² AReM is a California non-profit mutual benefit corporation formed by electric service providers that are active in California's direct access market. The positions taken in this filing represent the views of AReM but not necessarily those of individual members of AReM or the affiliates of its members with respect to the issues addressed herein.

I. INTRODUCTION

The Proposed Decision sets forth specific recommendations from the California Public Utilities Commission (“Commission”) and the California Energy Commission (“CEC”) to the California Air Resources Board (“ARB”) on the implementation of AB 32 for the electricity and natural gas sectors. WPTF/AReM supports many of the recommendations in the Proposed Decision on GHG regulatory policy and the implementation of AB 32.

In particular, WPTF/AReM commends the PD for calling for a broad, multi-sector cap and trade program, and for proposing core design features that will ensure an efficient, liquid and transparent allowance market. We fully endorse the PD’s recommendation that the electricity sector be treated equitably in the cap and trade system through an allocation of GHG emissions allowances that is based on its proportion of actual historic emissions in California. WPTF/AReM also generally support the PD’s recommendation that initially 80% of the allowances should be distributed to first deliverers at no cost and 20% should be auctioned, transitioning over time to 100% auction.

However, we are very concerned about the PD’s recommendation that the allowances to be auctioned should first be allocated directly to retail providers. While retail providers may have a role with respect to the disposition of auction revenues (in the event there is a determination that such revenues should be returned to ratepayers), their role should be no more than that of a conduit of auction revenues for narrowly-prescribed activities. WPTF/AReM also request that the PD be revised to clarify that the recommendation for ARB to establish energy efficiency investment requirements for retail providers does not include electric service providers (“ESPs”), which unlike utilities have no assurance that they will recover the related costs from their customers.

II. COMMENTS

A. Allowances Should Not Be Allocated Directly to Retail Providers.

WPTF/AReM's most serious concern with the PD is with respect to the PD's recommendation that allowances that are not allocated to deliverers should be allocated directly to retail providers, which would then be required to make allowances available through a centralized, non-discriminatory auction. This concern primarily stems from the fact that the PD appears to create a system that would leave retail providers with significant authority with respect to how the auction revenues would be used. These concerns are described in more detail below.

1. **Allocating allowances directly to cost-regulated retail providers could hinder the development of competitive markets for new generation technology development.**

It is inherently incongruous to have competitive businesses that compete to supply low-carbon technologies and services rely on cost-regulated entities for access to the funds needed to accelerate their deployment. Given that some (or all) retail providers may have investment preferences of their own, this proposal could well erode the development of competitive markets for low-carbon generation technology development, renewable energy and energy storage development, and retail energy services management. This would be a particularly acute problem where the retail provider is also a generator with a need for emissions reduction investment. In short, cost-regulated retail providers cannot be relied on to be efficient or neutral agents for ensuring the most competitive new technologies are adopted, deployed and made available to California customers. Instead, the state should establish a truly neutral, independent funding body that would receive the bulk of the auction revenue and would apportion it on a competitive basis to developers of new low-carbon technologies and services.

Second, the PD appears to envision using retail providers as the state's agents to achieve all low-carbon public policy goals in the electric sector. These providers do not have a unique claim to the skills and abilities needed to carry out many types of low-carbon technology development and deployment. The proposed allocation approach would diminish the benefits that a more transparently competitive approach would create in terms of providing incentives for technology innovation and efficient deployment of carbon reduction alternative.

Instead, the Commission should recommend that the services that retail providers may provide using allowance revenue are limited to (a) rate discounts to buffer cost impacts to their price-sensitive captive customers; and (b) certain energy efficiency services that cannot be provided more cost-effectively through competitive energy service companies or through a standards-based approach. Competitive, arm's-length affiliates of retail providers could, of course, be allowed to compete for funding from the neutral, independent funding body recommended above, as long as that competition was on a level playing field and free of any risk or cost subsidies provided by the retail provider's regulated rates or captive customers.

2. Allocating allowances directly to retail providers could unnecessarily complicate the transition to a federal cap-and-trade system.

Not only would this approach ensure a lower cost impact on California consumers, and a lower cost of achieving the state's GHG reduction and new technology goals, it would also favor an easy transition to any foreseeable federal program. In particular, it currently appears most likely that any federal cap and trade program will include a federal entity, either the general fund or a special purpose entity that will distribute allowance value for achieving GHG-related public purposes. It would be far less complicated for such a federal system to step into a parallel structure in California, e.g. by depositing federal allowance revenue into a state fund, than it

would be for Congress to agree to allocate funds intended for low-carbon technology deployment to specific private businesses (i.e., the retail providers) in California.

3. The Commission should explore legislative alternatives to retail provider control over auction allowances.

WPTF/AReM also disputes the PD's stated basis for this recommendation: "[H]aving the retail providers rather than the State own the allowances at the time they are auctioned would simplify the auctioning and revenue distribution process, in that auction revenues would pass directly to the retail providers rather than being deposited first in State-controlled accounts and then redistributed to the retail providers through an auction revenue rights mechanism." This approach simply does not address the acknowledged "anti-competitive concerns that the independent producers have raised regarding the distribution of allowances to retail providers."³ WPTF/AReM suggest that the Commission should instead include in its final decision a recommendation to explore legislatively-approved alternatives to using the general fund.

4. Recommendations

For these reasons above, the PD should be modified to preclude allocation of allowances to retail providers. To the extent auction revenues are to be distributed for the benefit of to ratepayers, the auction should be conducted by ARB or some other state agency, and the revenues earmarked for retail providers to request for narrowly defined, well-supported purposes, such as rate relief and the provision of specified energy efficiency services, as discussed in our comments above. Even if assigning auction revenues to a neutral, independent funding body does trigger state fiscal oversight, WPTF/AReM believes any risks associated with such an outcome are less than the risks inherent in assigning management responsibilities to retail providers.

³ PD, at p. 174.

B. WPTF/AReM Endorse Many Elements of the PD's Recommended Strategies.

WPTF/AReM wholeheartedly concur with the PD's endorsement of a broad, multi-sector cap and trade program, as the most cost-effective means of reducing GHG emissions in the long-term. While a California-only GHG cap and trade system is a third best option compared to a federal or regional cap and trade system, it is far superior to an electricity-sector only trading system and traditional command-and-control regulation. Therefore, WPTF/AReM share the vision contained in the PD that California's program should be as broad as possible in sectoral and geographic scope and linked bilaterally to other comparable trading systems (state and regional), with a view that these regional programs will eventually be linked together through a federal system. To this end, we urge the Commissions to use their considerable influence to bring other states within the Western Interconnect into the Western Climate Initiative ("WCI") and to support a timely transition to a federal system.

WPTF/AReM also agree with the PD's recommendations on the following key market design features, which we believe will help ensure a flexible, liquid and transparent allowance market:

- No restrictions on participation of entities in the GHG allowance market;
- Unlimited banking of allowances, with safeguards against market manipulation;
- Three year compliance periods (3 years) and further consideration of staggered and rolling compliance periods;
- The absence of price cap and floors or other forms of safety valves; and
- Inclusion of high-quality offsets to control costs.

WPTF/AReM also strongly endorse the PD's recommendation that ARB not establish individual sectoral caps, but rather provide the electricity sector with an overall emissions

allowance allocation based on its historic proportion of statewide emissions. However, WPTF/AReM also consider it necessary to take into account the effect of GHG measures that may increase load (and potentially, therefore, electric sector emissions), such as plug-in hybrid cars and port electrification in determining the appropriate allocation to the electric sector. Moreover, to the extent that emissions from imported power are not subject to a GHG cap (e.g. imports from a state that is not participating in the Western Climate initiative), these emissions should also be included in the baseline emissions for the purpose of determining the electric sector's allocation. WPTF/AReM encourage the Commissions to continue to work with ARB on both of these issues.

C. Allocation of Allowances to the Electric Sector Should Be Harmonized With Regional Partners.

The PD further recommends that 80% of the electric sector allowance allocation be allocated initially to electricity deliverers on a fuel-differentiated, output basis with the remaining 20% to be purchased through auction. The percentage of allowances auctioned would increase by 20% each year to 100% in 2016. WPTF/AReM offers no comment on the appropriateness of the proportion of allowances to be auctioned, but notes that the proportions are higher than the minimum required under the WCI's Final Design Recommendations, released September 23rd. As WPTF/AReM has argued previously in our comments to the WCI, allowance allocation methods should be standardized for the electricity sector throughout the WCI region, due to the increasingly competitive and interlinked power markets.

Because a large portion of power within the WCI region crosses jurisdictional borders, the relative profitability of two similarly-situated generators (i.e. fuel, technology) could be altered simply due to differences that exist in their respective states with respect to allowance allocations. For instance, if two identical gas-fired generators sell power into the same market,

but one in California must buy 100% of its allowances through auction (as is proposed for 2016), while a generator in another WCI state receives most of its allowances through direct allocation based on its historic emissions, both generators would receive the same price for their power, but would incur very different costs. Compliance costs would be higher, and profits lower, for the California generator. The difference in allocation methods has thus altered the relative profitability of two otherwise identical facilities.

For this reason, WPTF/AReM request that the Final Decision contain a strong statement recognizing the need for harmonization of allocation methods in the electricity sector across WCI members, and urges the Commissions to use their considerable influence at WCI to ensure the development of harmonized allocation mechanisms.

D. Energy Efficiency Investment Requirements Should Not Be Imposed on Non-Utility Retail Providers.

The PD recommends several ways in which energy efficiency could be increased, including imposing investment requirements on “all retail providers” for energy efficiency programs. From the PD’s discussion of this topic, it appears that what the Commissions have in mind is to expand and increase investment in energy efficiency programs by CPUC-jurisdictional utilities and for ARB to establish energy efficiency investment requirements for publicly-owned utilities. However, we are concerned that the Commissions also envision ARB establishing energy efficiency requirements for non-utility retail providers such as ESPs. As WPTF/AReM have previously noted⁴, ESPs are already facilitating their customers’ energy efficiency efforts. In addition, direct access customers are eligible for most IOU-administered energy efficiency programs and help finance these programs through utility charges. Thus, there is no need to impose specific energy efficiency requirements on ESPs. Moreover, imposing such

⁴ February 28, 2008, Comments of the Western Power Trading Forum and the Alliance For Retail Energy Markets on the Interim Opinion on Greenhouse Gas Regulatory Strategies, at pp. 4-5

requirements on ESPs would those entities at a competitive disadvantage, given that, unlike the IOUs, they are not compensated for the reductions in revenues they would experience as a result of customer energy efficiency, nor are they assured the recovery of program administration costs. WPTF/AReM therefore request that the PD be modified to clarify that the Commissions' recommendation only applies to cost-regulated retail providers and does not include ESPs.

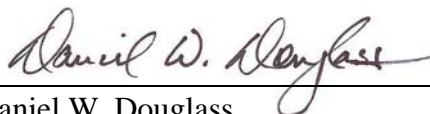
III. CONCLUSION

For the reasons above, WPTF and AReM support adoption of the Proposed Decision with the modifications and clarifications described herein. WPTF and AReM appreciate this opportunity to comment on the Proposed Decisions and the Commissions' consideration of our concerns.

Respectfully submitted,



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October 2, 2008

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing *Comments of the Western Power Trading Forum and the Alliance for Retail Energy Markets on the Proposed Decision on Greenhouse Gas Regulatory Strategies* on all parties of record in **R.06-04-009** by serving an electronic copy on their email addresses of record and, for those parties without an email address of record, by mailing a properly addressed copy by first-class mail with postage prepaid to each party on the Commission's official service list for this proceeding.

This Certificate of Service is executed on October 2, 2008, at Woodland Hills, California.



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