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 13, 2006)

ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION
OF THE STATE OF CALIFORNIA

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

COMMENTS OF THE CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION ON THE FINAL OPINION ON GHG REGULATORY STRATEGIES

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COMMENTS OF THE
CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION
ON THE FINAL OPINION ON GHG REGULATORY STRATEGIES

In accordance with the Rules of Practice and Procedure of the Public Utilities Commission ("CPUC") of the State of California, the California Municipal Utilities Association ("CMUA") hereby files these Opening Comments to the *Final Opinion on Greenhouse Gas Regulatory Strategies* ("Proposed Decision" or "PD") issued on September 12, 2008, in R.06-04-009. CMUA also files these Opening Comments with the California Energy Commission ("CEC") in Docket 07-OIIP-01. In these Comments, the CPUC and CEC will collectively be called the "Joint Agencies" and the California Air Resources Board will be called "ARB."

I. EXECUTIVE SUMMARY

CMUA supports the goals and effective implementation of AB 32. However, the implementation of the AB 32 GHG standards must not result in cost shifts between retail providers or their ratepayers, either from other retail providers or from any other GHG emitters. Each retail provider's financial resources should go towards investments in direct emission reductions and not be used to fund a mandatory market-based system.

California is not a large enough market for a GHG credit trading program and therefore, CMUA opposes the Joint Agencies' proposal to allocate allowances by auction. If such markets are established, they must be at least regional in nature and preferably implemented on a nationwide basis. In the short term, until regional or national markets develop, CMUA supports entity-specific administrative caps which will provide milestones to regulated entities on the amount of GHG reduction each must achieve to meet the AB 32 requirements. Moreover, the administrative caps must not result in cost shifts among retail providers, their customers, or individual sectors.

During the period leading up to January 1, 2011, ARB will conduct open rulemakings to design a multi-faceted AB 32 compliance plan for the entire state. The Joint Agencies are acting prematurely in proposing program designs that may ultimately be proven inadequate during rulemakings at ARB, the regional processes of the Western Climate Initiative ("WCI"), or eventually at the federal level.

II. SECTION 4.2 - RELIANCE ON MARKETS AND MANDATES

A. CMUA supports entity-specific administrative caps which will provide milestones to regulated entities on the amount of GHG reduction each must achieve to meet the AB 32 requirements.

The Proposed Decision supports a mechanism comprising "both mandatory/regulatory measures and a multi-sector market-based cap-and-trade program for the electricity and natural gas sectors in California." (PD at 107). Many stakeholders in this rulemaking, including CMUA, have expressed opposition to a cap-and-*mandatory trade* mechanism. (PD at 104, 105). Yet, the Proposed Decision states that "[n]othing in parties' comments or in the E3 modeling work convinces us that we should reconsider our support of both additional mandatory measures, as discussed above, and a well-designed cap-and-trade system." (PD at 107, 108).

CMUA does not support implementing a cap-and-*mandatory trade* mechanism in California. CMUA continues to advocate for entity-specific administrative caps which will provide milestones to regulated entities on the amount of GHG reductions required. At most, CMUA supports the availability of a voluntary trading mechanism if additional reductions are needed by regulated entities to meet their emissions cap. These two principles will both encourage and enable retail providers to select the most cost-effective and technologically feasible means for reducing their GHG emissions.

B. Each retail provider's financial resources should be used to directly achieve GHG emission reductions and not to fund mandatory market-based systems.

Below are CMUA's responses to selected relevant points expressed in the PD.

- The PD acknowledges that the efficacy of a cap-and-*mandatory trade* system is "highly dependent upon design," and states that "monitoring and verification will be needed" to ensure that real and reasonably priced emission reductions are achieved. (PD at 108). Moreover, the PD states that this extensive monitoring activity will be required to ensure that "significant revenue shifts unrelated to emission reductions between customers of different retail providers, or from retail providers to generators, are avoided." (PD at 108). CMUA believes that these structural threats to a successful AB 32 program would be absent in a cap-and-*voluntary trade* program. By way of example, the WCI and Climate Action Team laud the federal Acid Rain Program for its success whereby the government's role in that program's allowance trading mechanism is effective but administratively minimal.[1] Accordingly, ARB should explore many other options or models besides the one recommended in this PD.

[1] *Design Recommendations for the WCI Regional Cap-and-Trade Program*, 49 (September 23, 2008), *available at* http://www.westernclimateinitiative.org/ewebeditpro/items/O104F19865.PDF; *Climate Action Team Report to Governor Schwarzenegger and the Legislature*, 66 (March 2006), *available at* http://www.climatechange.ca.gov/climate_action_team/reports/2006report/2006-04-03_FINAL_CAT_REPORT.PDF.

- The PD states that "the cap-and-trade program can serve to supplement other policy tools in place by providing a backstop" and that "a cap-and-trade program will likely provide a relatively small incremental portion of the overall emission reductions needed to meet the 2020 limit . . . ." (PD at 109). Both of these statements indicate that the lion's share of emission reductions will be achieved by direct actions of regulated entities. Hence, ARB must thoroughly evaluate whether a voluntary secondary market would be a more cost-effective approach to achieve the supplemental and incremental reductions than a *mandatory trading* mechanism.

- The PD declares that "without a cap-and-trade program or carbon fees, there would not be a price incentive for the fossil-fired portion of the electricity sector to become more efficient" and "[t]here would be no market to reward clean-burning fossil technologies or to provide incentives for the incremental efficiency changes that can be made in a host of fossil fuel-using facilities." (PD at 109). "However, the overlay of a cap-and-trade mechanism on mandatory programs serves as an insurance policy to make sure the emission reductions occur, and to supplement enforcement mechanisms by providing additional economic benefits for achievement of the mandates. Similarly, the incorporation of the mandates provides additional assurance that the overall program will deliver tangible, near-term results." (PD at 111). CMUA disagrees. Presuming that ARB establishes enforcement standards for AB 32 compliance, the electric sector will have sufficient incentives to modify its resource mix and improve efficiencies.[2]

- The PD states that a mandatory market-based approach is necessary "to leverage the potential for discovery of emission reduction measures currently unknown to regulators—in order to achieve incremental emissions reductions at least cost and over the longer term is supported by E3's analytics." (PD at 111). CMUA believes that a mandatory cap-and-*voluntary trade* mechanism will more efficiently encourage R&D.

The PD acknowledges several downsides of a cap-and-*mandatory* trade program, including: (1) an "upward pressure on allowance prices in a cap-and-trade market . . . on short notice due to the failure of mandates"; (2) "larger-than-expected shifts of revenue between retail providers without productive emissions reductions"; (3) "larger-than-expected windfall profits"; and (4) "costs incurred by retail providers due to unexpectedly high or volatile allowance prices . . . ." (PD at 111, 112). In light of these structural weaknesses, the PD fails to demonstrate how a cap-and-*mandatory trade* mechanism is the required or even preferred method to achieve the AB 32 goals. The Joint Agencies should concede that for some electric sector entities, direct emission reductions may be the most cost-effective method to comply with AB 32.

[2] In order to encourage improved efficiencies in fossil-fired powerplants, the Joint Agencies should consider modifying the rules restricting powerplant *improvements* adopted pursuant to the SB 1368 emission performance standard.

III. SECTION 5.2.2 – AUCTIONING WITH DISTRIBUTIONS TO RETAIL PROVIDERS

A. California is not a large enough market for a GHG credit trading program and CMUA opposes allowance allocations by auction.

CMUA opposes the auction methodology for allocating allowances in any market-based system. The burdens and potential harms that accompany an auction system outweigh any possible gains. On the contrary, a cap-and-*voluntary trade* mechanism will probably achieve the AB 32 goals more cost-effectively and with a lesser administrative burden.

CMUA notes that certain parties, to the extent that they can forecast how an auction would impact their operations, believe that an auction mechanism will result in higher compliance costs and decreased system reliability. In their determination, some of these parties argue that an auction would be the *most expensive* compliance methodology and may be entirely unnecessary in light of the magnitude of programmatic reductions that will be achieved by retail providers.

The PD states that "[a]uctioning would provide a strong incentive for deliverers to reduce emissions associated with their power." (PD at 165). However, the Joint Agencies did not explain why an auction would be a greater incentive than a mandatory cap-and-*voluntary trade* mechanism. Furthermore, the PD recognizes that an "auction could be complex to develop and administer," yet, proposes an auction without explanation as to why this administrative complexity would be ignored when the Joint Agencies themselves have deemed this one of the five key evaluation criteria. (PD at 165). CMUA recommends that the PD be amended to remove the mandatory nature of its proposed trading mechanism.

B. AB 32 requirements must be implemented without resulting in cost shifts among utilities, consumers, or different sectors.

There must be a proportionality of reduction obligations *among the different sectors*. The electric sector should not be required to carry an inequitable share of California's obligation to reduce statewide greenhouse gas emissions, and as the PD notes, the temptation to assign greater reduction obligations to the electricity sector must be resisted. Electricity consumers will ultimately bear the costs of AB 32 compliance and they must not suffer a disproportionate share of the cost for reducing statewide GHG emissions. Furthermore, there should be no artificially manufactured cost shifts between entities within the electric sector.

In regard to these costs and obligations, there is tremendous uncertainty in the PD's recommendations by virtue of the E3 modeling results being aggregated. It is impossible for many retail providers to measure or forecast the PD's possible effects on their operations. The PD states

that one criterion for evaluating program options is to "treat all market participants equitably and fairly" and notes that the criterion is "grounded in [Health & Safety Code section] 38562(b)(1)." (PD at 131, 141). CMUA agrees with this overriding criterion, yet, CMUA points out that the E3 modeling and analysis lacks the specificity to meet the PD's own standard. For example, the various estimates of effects was aggregated into the state's five largest retail providers and lumped multiple publicly-owned electric utilities into "NorCal Other" and "SoCal Other." (E.g., PD at 150, 157, 159, 164, 167, 169, 212). In regard to the public power sector, this treatment condensed approximately 40 small-to-medium retail providers into these latter two groups. Therefore, the modeling results provided no information regarding potential impacts on the more than 2.5 million residential-commercial-industrial-agricultural customers served by these publicly-owned retail providers.

CMUA requests that the Joint Agencies acknowledge the diversity of stakeholders (e.g., public, private, retail provider, and deliverer) within the electric sector and recognize these uncertainties and limitations of the current modeling efforts. Accordingly, the PD's recommendations are too conclusory for this stage *prior to the adoption of a Scoping Plan*. The PD should not prematurely constrain the Joint Agencies into following a path that may be proven inequitable and cost-*in*effective during subsequent state, regional, and federal proceedings.

IV. CONCLUSION

CMUA respectfully requests the Joint Agencies to consider these Opening Comments and make the appropriate amendments to the Proposed Decision on greenhouse gas strategies.

Dated: October 2, 2008

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the attached:

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CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION
ON THE FINAL OPINION ON GHG REGULATORY STRATEGIES

on all known parties to R.06-04-009 by transmitting an e-mail message with the document attached to each party named in the official service list. I served a copy of the document on those without e-mail addresses by mailing the document by first-class mail addressed as follows:

See attached service list

Executed this 2nd day of October 2008, at Sacramento, California.

Vicki Ferguson

CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

Proceeding: R0604009 - CPUC - PG&E, SDG&E,
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