

+ MPR designed to determine

- "Market" costs of electricity allocated to ratepayers
- "Above-market" costs to be paid by the state

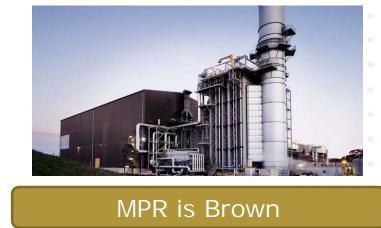
+ Proxy Plant – Combined Cycle Gas Turbine

- Long-term fixed price contract
- Merchant owner with utility contract
- All-in levelized \$/MWh needed to attract investment

+ Reflect value of

- Peaking vs. base load
- firm vs. as-available
- Time-of-Delivery (TOD)

Energy+Environmental Economics



| DOCKET | | | | | | |
|--------|-------------|--|--|--|--|--|
| 11-1 | EP-1D | | | | | |
| DATE | MAY 09 2011 | | | | | |
| RECD. | MAY 09 2011 | | | | | |
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MPR is a (Blunt) Policy Instrument

- + Part of larger policy promoting renewables
- + Finance high capital cost technologies
- + Market based benchmark
- Fully recover fixed and variable costs with levelized, fixed all-in energy and capacity (\$/MWh)
- + Use publicly available and transparent data
- + Public stakeholder process





- + Proxy for a market/product that doesn't exist
- + Energy Price: All-in Fixed with TOD Factors
- + Gas Price: Long-term fixed/hedged
- + Dispatch: Economic dispatch by plant owner



"Everything seems to be in order with the legal papers for our merger."



Cash Flow Model

| Veer | 2010 | 2011 | 2012 |
|--|-------------------|-------------------|----------------|
| Year | 1 | 2 | 3 |
| GENERATION | | | |
| Annual Production (kWh) at load center | 3,939,643,180 | 3,939,643,180 | 3,939,643,180 |
| REVENUES | | | |
| Total revenues | \$ 268,042,938 | \$ 293,001,800 | \$ 317,042,047 |
| VARIABLE COSTS | | | |
| Variable O&M and Fuel Costs | \$ 191,547,683 | \$ 215,605,562 | \$ 238,674,919 |
| OPERATIONAL EXPENSES | | | |
| Total Expenses | \$ 14,678,948 | \$ 14,448,726 | \$ 14,226,198 |
| OPERATING INCOME | | | |
| Operating Income | \$ 61,816,307 | \$ 62,947,512 | \$ 64,140,930 |
| After-Tax Cash Flow | \$ 26,621,476 | \$ 34,631,963 | \$ 34,053,029 |

| Check on ROE Result | | | | | | • |
|---------------------|---------------|-----|------------------|-------|------------|------------------|
| Equity Investment | | Cas | sh Flow | 0.0.0 | | |
| \$ | (259,430,243) | \$ | 26,621,476 | \$ | 34,631,963 | \$ 34,053,029 |
| | 11.96% | < | Should = 11.96 | % | | |

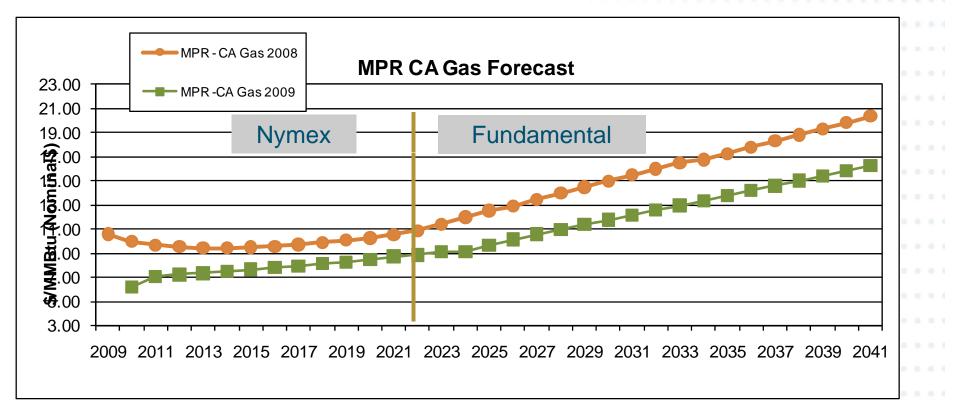
Fully recover costs and provide target return on equity to shareholders

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| KEY ASSUMPTIO | |
|----------------------|--|
| RETASSUMPTIO | |
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MPR is unusual in that it assumes gas prices are hedged/fixed for full contract term

~ 60% of total MPR cost

Energy+Environmental Economics



| Install Capital Cost Inputs (2008\$) | Palomar (S Combine 555 | ed-Cycle | | s (SMUD) ed-Cycle MW | Colusa (PG&E) Combined-Cycle 657 MW | | |
|--|------------------------------|---------------|--------------|----------------------------|--|---------|--|
| | (Million \$) | \$/kW | (Million \$) | \$/kW | (Million \$) | \$/kW | |
| Capital Cost Investment - Overnight Costs | 506.20 | \$912 | 510.83 | \$1,022 | 684.40 | \$1,042 | |
| Interconnection (natural gas, water, electric) | | | \$24.55 | \$49 | \$0.00 | \$0 | |
| Environmental Review & Permitting | | stant Capital | | stant Capital | | | |
| Emissions offsets | 1 | | Costs Sho | own Above | Included in Instant Capital Costs Shown Above | | |
| Dry Cooling Adjustment | \$29 | \$52 | \$26 | \$52 | | | |
| Contingency | - | - | - | | - | - | |
| AFUDC | - | - | | | - | - | |
| EITC | - | - | | | - | - | |
| Other or Subtotal | \$92 | \$165 | | • • • <u></u> • • • | - | - | |
| Total "Turn-Key" Capital Costs (2008\$) | \$627 | \$1,129 | \$561 | \$1,123 | \$684 | \$1,042 | |

Average Installed Capital Costs (2009 \$/kW)

\$1,098

\$19

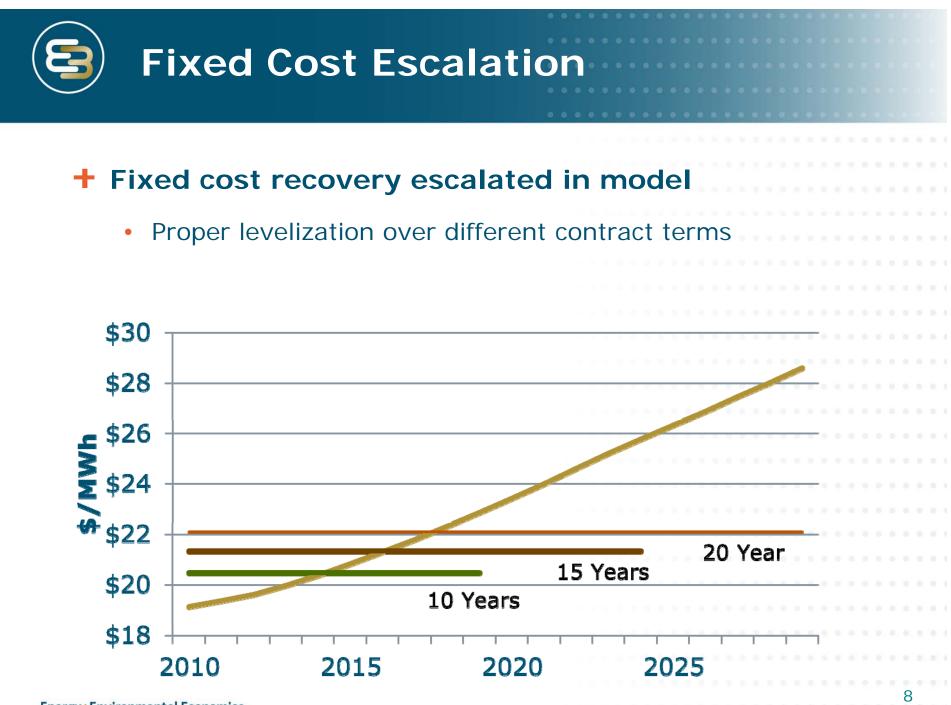
vironmental Permit Costs (2009 \$/kW) (incl. abov

 Average of three public cost estimates for plants recently built in CA.



| | Palomar | | | | | | | | |
|-------------------------|---------|----------|------------|-----|--|--|--|--|--|
| | Date | Plant | Adjustment | Pct | | | | | |
| Date of Estimate | Jun-04 | \$410.15 | \$74.34 | | | | | | |
| in \$Year | Jun-06 | | | | | | | | |
| Backcast from \$Year to | | 1.0.0 | | | | | | | |
| Date of Estimate | Jun-04 | \$397.23 | \$72.00 | -3% | | | | | |
| Adjusted Cost Estimate | Jun-06 | \$439.73 | | 7% | | | | | |
| Dec-09 | | \$506.20 | \$91.75 | 15% | | | | | |

- + Details: Date of estimate, date of operation, \$ Year
- + Escalate costs to current year using Handy-Whitman
- Escalate costs forward using Army Corp of Engineers Civil Works Construction Cost Index System (CWCCIS)



Energy+Environmental Economics



| Input | Value | Notes |
|-------------------------------|--------|---|
| Debt (%) | 50% | |
| Equity % | 50% | |
| Cost of Debt (%) | 7.67% | Cost of Debt (industrial firms) = risk free rate (20 year T-Bill) + risk premium (mid point between BBB & B+) |
| Cost of Equity (%) | 11.96% | Cost of Equity = risk free rate (20-yr Tbill) + risk premium (equity) + mid-cap risk premium (equity) |
| WACC | 8.25% | Weight-Average Cost of Capital = (Cost of Equity x Equity %) + (Cost of Debt x (1-tax rate) x Debt %) |
| Risk Free Rate | | |
| 10-Year Tbill | 3.46% | August 28, 2009 |
| 20-Year Tbill | 3.84% | Risk Free Rate = Mid point between 10 and 30 yr T-Bill (US Treasury yields) |
| 30-Year Tbill | 4.21% | |
| Risk Premium (Debt) | | |
| BBB/Baa2 | 2.30% | Average of the 10-Year BBB/Baa2 Risk Premium and 30-Year BBB/Baa2 Risk Premium |
| Mid Point | 3.84% | Risk Premium (Large Manufacturer) = Mid point between BBB and B+ rated company |
| B+/B1 | 5.38% | Average of the 10-Year B+/B1 Risk Premium and 30-Year B+/B1 Risk Premium |
| Risk Premium (Equity) | 7.17% | |
| Mid-Cap Risk Premium (Equity) | 0.95% | |

Negotiated Settlement: Contract with creditworthy utility → Between utility and IPP



Financial Data

Data Sets

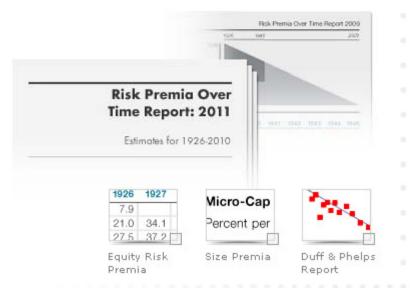
| Topic | Current data sets (see above for data of update) | Download Excel file | Archived Data |
|--------------------------------|--|--|--|
| Corporate Governance | Insider and Institutional Holdings by Industry Sector | Download | <u>Jan 99, Jan 00, Jan 01, Jan 02, Jan 03,</u> Ja <u>n 04 , Jan 05 , Jan 06 , Jan 07, Jan 08,</u> J <u>an 09, Jan 10</u> |
| | <u>Historical Returns on Stocks, Bonds</u> and Bills - United States | Download | |
| | Implied Equity Risk Premiums - United States | <u>Download</u> | |
| | Risk Premiums for Other Markets | <u>Download</u> | J <u>an 01, Jan 02, Jan 03, Jan 04, Jan 05,</u> J <u>an 06 , Jan 07, Jan 08, Jan 09, Jan 10</u> |
| Discount Rate Estimation | Levered and Unlevered Betas by Industry | U.S. Europe Japan Emerg Mkt Just China Just India Global | <u>Jan 99, Jan 00, Jan 01, Jan 02, Jan 03,</u> Jan 04. Jan 05 , Jan 06 , <u>Jan 07</u> . Jan 08, Jan 09, Jan 10 |
| | <u>Marginal tax rate by country</u> For full version go to the <u>KPMG site</u> | <u>Download</u> | |
| | Total Beta By Industry Sector | <u>Download</u> | Jan 99, Jan 00, Jan 01, Jan 02, Jan 03, Jan 04, Jan 05, Jan 06, Jan 07, Jan 08, Jan 09, Jan 10 |
| | Risk Measures by Market Cap Class | <u>Download</u> | |
| | Costs of Capital by Industry Sector | <u>Download</u> | J <u>an 99, Jan 00, Jan 01, Jan 02, Jan 03,</u> Jan 04 , Jan 0 <u>5</u> , Jan 06 , Jan 07, Jan 08, Jan 09, Jan 10 |

http://pages.stern.nyu.edu/~adamodar/

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Ibbotson U.S. Risk Premia Reports

The Risk Premia Over Time Report gives financial and valuation professionals the tools to determine long-, intermediate-, and short-horizon equity risk premia for the United States, as well as mid-, low-, and micro-cap size premia using customizable start and end dates. The Duff & Phelps, LLC Risk Premium Report examines the size effect through alternative measures of size. Archived versions of these reports are also available.



http://corporate.morningstar.com

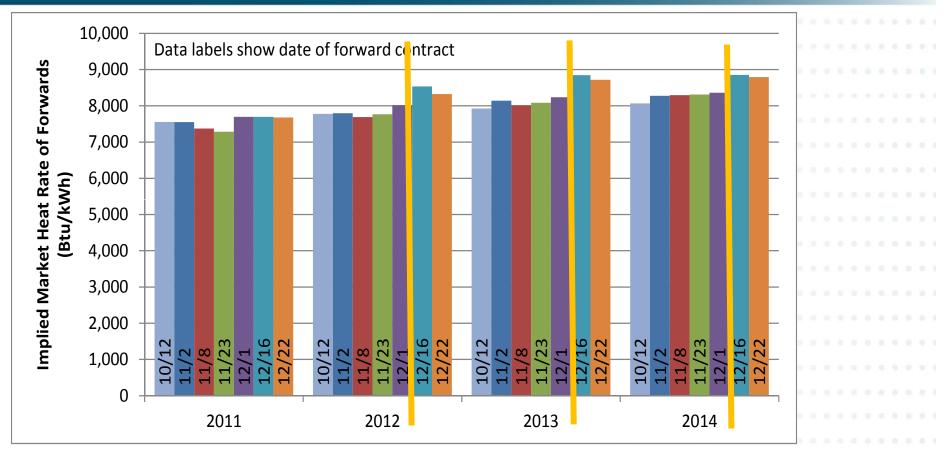
http://www.bondsonline.com/

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| | | Own | er | U | tility | * * * * * * * * * * * * * |
|---------------------------------------|-----|-----|-------|-----|--------|---------------------------|
| | IPP | MPR | Renew | MPR | Renew | |
| Energy Price | | | | | | |
| Natural Gas Price | | | | | | |
| Quantity | | | | | | |
| Technology | | | | | | |
| Contract | | | | | | |
| Regulatory | | | | | | |
| Counterparty Credit | | | | | | |
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| LOW Energy+Environmental Economics | | | | | High | 11 |





Jump in the implied market heat rate in mid-December, coincident with the ARB's announcement of future AB32 capand-trade regulations

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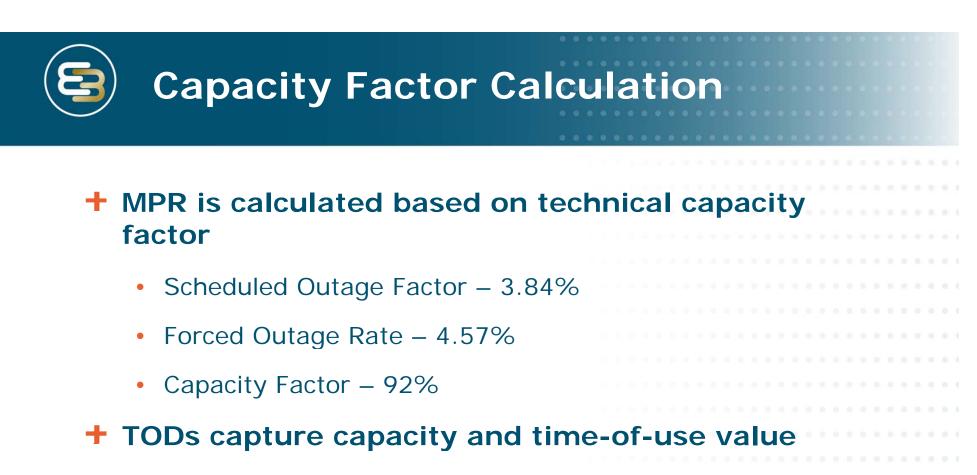
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| MPR LIMITATIO | |
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| MPR becomes a floor | |
|---|-------------------|
| MPR becomes a anchor | |
| IOU's are short RPS generation | |
| Single brown price applied t renewable technologies | o wide variety of |
| <u> </u> | |
| Supplemental Energy Payme | ents (SEPs) not |
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- Fixed, all-in energy & capacity statewide average \$/MWh
- + Full cost recovery for the proxy plant.
- + Not provide an over/under collection of capacity value for deliveries in off/on-peak periods
- Incorporate the TOD factors of 3 IOUs into the revenue calculations of the MPR model
- Reflect the best estimate of operating behavior under the presumed contract and market conditions for the proxy plant.

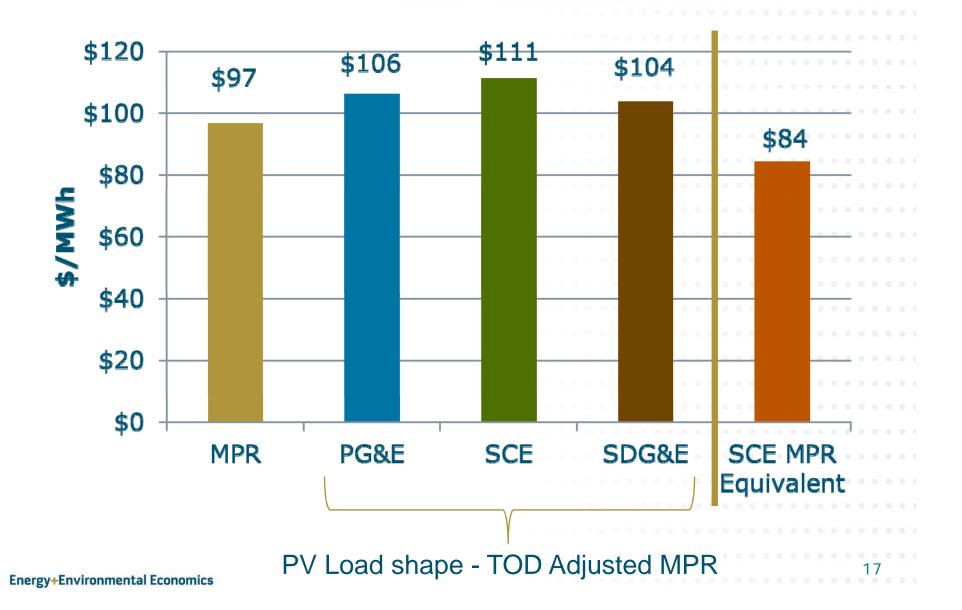


| → MPR intended to be used in combination with |
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| Expected Generation Profile | |
| | |
| TOD Factors | |

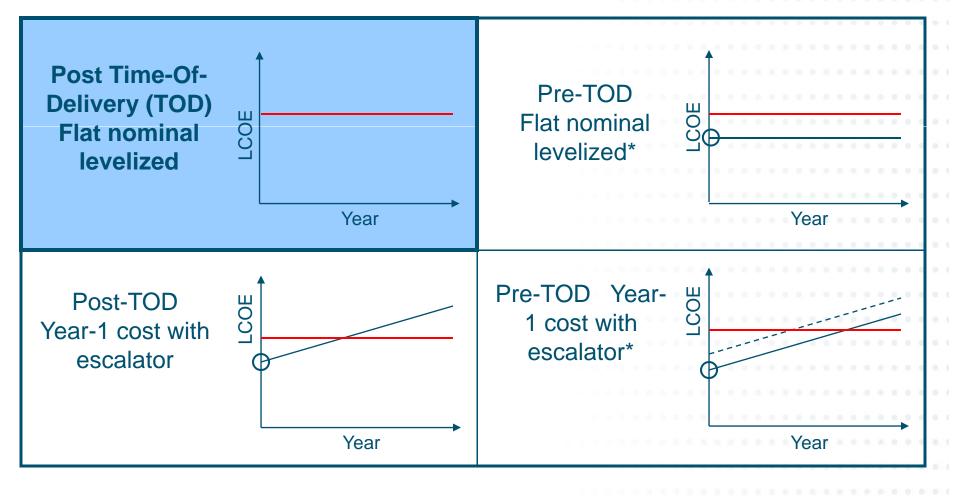


How Solar Beats MPR





Post-TOD flat nominal levelized used to show results





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| LIFE AFTER DEA | | | | | | | | | | |
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Delete existing MPR provisions;

- instead PUC required to establish limit for each electrical corporation on the procurement expenditures for all eligible resources used for compliance
- Limits total expenditures to a de minimus increase in rates.
- MPR continued to be used for Feed In Tariff for less than 3 MW



- Energy and Environmental Economics, Inc. (E3) has provided consulting services and expert analysis on key issues facing electricity sector clients since its founding in 1989.
- Robust analytics combined with policy depth uniquely position E3 to provide clients with analytical, technical and regulatory expertise to maximize the value of their assets

+ Eric Cutter– Senior Consultant

- 20+ years in energy industry
- Leads energy storages, electric vehicles, distributed energy resources and energy/water practice areas





ADDITIONAL

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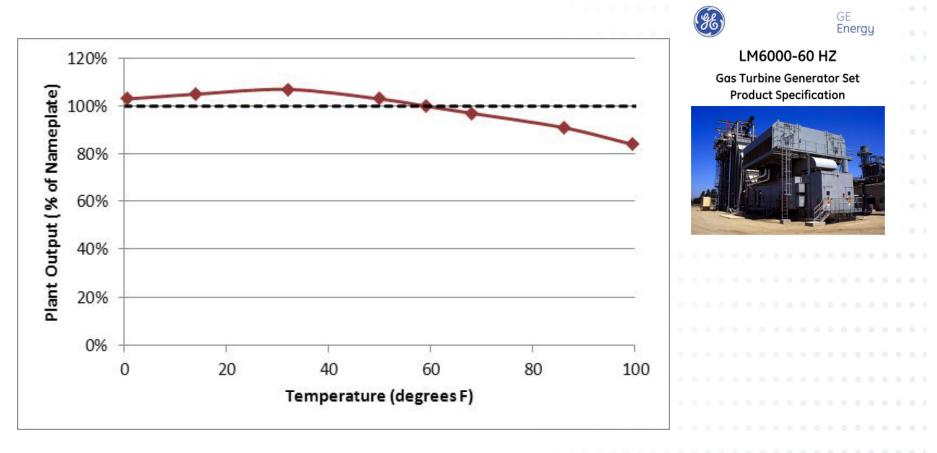


+ Temperature affects operations in three ways:



- Heat Rate: High temperatures result in increases in the heat rate, which in turn increases the cost of generating a unit of energy
- MW Output: At high temperatures, the output is reduced, lowering the revenues the unit can earn by selling into the real-time market
- Peak Capacity MW: During peak periods, when temperatures are also high, the output is reduced below nameplate. This reduces its peak capacity (resource adequacy) MW

CT Dispatch: Summer Peak Performance Penalty

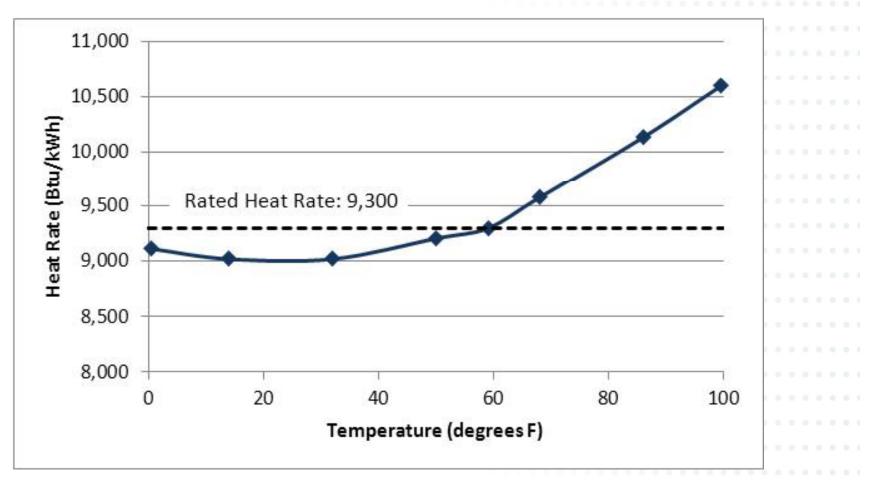


Output curve based on GE LM6000 with SPRINT technology and dry cooling:

http://www.hilcoind.com/images/ftp/SFPUC/7/A/LM6000%2060%20Hz%20Gr ey%202008%20Rev%202.pdf 24

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Heat rate curve based on GE LM6000 with SPRINT technology and dry cooling

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