

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

Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans.

Filed Public Utilities Commission
May 6, 2010 San Francisco, California
Rulemaking 10-05-006

**COMMENTS OF THE WESTERN POWER TRADING FORUM
ON PRELIMINARY SCOPING MEMO**

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TABLE OF CONTENTS

I.	Track I – System Planning.....	2
II.	Track II – IOU Bundled Plans.....	3
III.	Track III – Rule and Policy Issues.....	4
1.	Updates to Procurement Rules to Comply with SB 695 and Refinements to the D.06-07-029 Cost Allocation Methodology (CAM)	4
2.	Clarification / Refinement of Existing Procurement-Related Requirements in Support of the Development of a Procurement Requirements Summary Document (a.k.a. “Rulebook”).....	5
3.	Procurement Rules to Comply with OTC Policies.....	6
4.	California Independent System Operator Corporation Market - Related Procurement Implementation Issues –	7
5.	Refinements to Bid Evaluation in Competitive Solicitations (particularly with respect to UOG Bids).....	7
6.	Refinements to the Timelines Associated with IOU RFOs for RA Products.....	9
7.	GHG Compliance Products and Risk Management Strategies.....	10
8.	Other Procurement Rule Changes.....	10
a.	Refinements to the Independent Evaluator Process.....	10
b.	This proceeding should evaluate wholesale load auctions if the Commission declines to do so in the direct access rulemaking.....	10
c.	The Commission needs to adopt a single load forecast.....	11

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Pursuant to the directive provided in the May 13, 2010, Order Instituting Rulemaking (“OIR”) and Rule 7.1(d) of the Rules of Practice and Procedure of the Public Utilities Commission of the State of California (“Commission”), the Western Power Trading Forum (“WPTF”)¹ provides the following comments on the Preliminary Scoping Memo (“PSM”) in the above-referenced proceeding. The PSM provides for a three-track proceeding to examine issues related to Long-Term System and Local Reliability Resource Plan (Track I); Investor-Owned Utility (“IOU”) Section 494.5 Bundled Plans (Track II) and Rule and Policy Issues (Track III).

The three tracks are to be considered concurrently and the OIR states that “The numerical ordering of these tracks is not intended to imply a priority ranking or a chronological order to their resolution.”² WPTF generally concurs with the broad classification of issues described in the OIR and restricts these preliminary comments to the list of issues contained in the OIR, with suggestions for other issues that should also be considered within scope of the upcoming proceeding.

¹ WPTF is a California non-profit, mutual benefit corporation. It is a broadly based membership organization dedicated to enhancing competition in Western electric markets in order to reduce the cost of electricity to consumers throughout the region while maintaining the current high level of system reliability. WPTF actions are focused on supporting development of competitive electricity markets throughout the region and developing uniform operating rules to facilitate transactions among market participants.

² OIR, at p. 9.

I. Track I – System Planning

Track I proposes to consider “CPUC-jurisdictional needs for new resources to meet system or local resource adequacy and to consider authorization of IOU procurement to meet that need, including issues related to long-term renewables planning and need for replacement generation infrastructure to eliminate reliance on power plants using once-through-cooling (“OTC”).³ WPTF particularly recommends that the Commission ensure that key issues, such as the interplay of resource adequacy obligations with long-term procurement plan (“LTPP”) and load-serving entity (“LSE”) opt-out issues are fully addressed in this phase of the proceeding.

Put simply, there is a conflict between procurements that occur in LTPP and the role that resource adequacy (“RA”) is intended to have in supporting resource investment. The RA program imposes system and local capacity obligations on all LSEs – obligations that are predicated on objective reliability criteria – and then relies on markets to ensure that LSEs procure sufficient local and system resources to meet their capacity obligations. In contrast, through the LTPP, IOUs base their procurement proposals upon different and often ill-defined additional criteria for resources to satisfy the RA obligations, which are then procured through non-transparent solicitations. If administratively-determined long-term procurement authorizations exceed levels required to satisfy reliability obligations, the resultant over-supply undermines RA pricing and prevents bilateral RA markets from providing appropriate price signals for investment in both new and existing generation. The absence of appropriate price signals for RA capacity leads to potentially inefficient trade-offs between new and existing capacity and, in a vicious cycle, places further reliance on the LTPP for the development of new resources. Track I should investigate mechanisms to ensure that LTPP procurement does not

³ Id.

undermine the ability of the emerging RA markets to support and provide incentives for investments in new and existing resources.

II. Track II – IOU Bundled Plans

The OIR provides that “any decisions in Tracks I and III adopted before the November 19, 2010 Commission meeting will inform Track II of the current proceeding, while any Tracks I and III decisions adopted after this date will not inform Track II of the current proceeding.”⁴ WPTF understands the rationale behind the establishment of the November 19 date as a date for issues to be considered in the Track II IOU procurement plans. However, we strongly urge the Commission to adopt an accelerated schedule for the consideration of Track I and Track III issues so that the IOU procurement plans are informed by the resolution of the issues contained in those tracks. There is a clear need to move ahead quickly so that many of these issues, such as appropriate treatment of load migration, can be resolved before moving to the Phase II consideration of the IOUs’ bundled plans.

WPTF also recommends that an additional threshold Track II issue should be how to accurately forecast retail choice [direct access and community choice aggregation (“CCA”)] so that such forecasts are incorporated within the IOU’s respective bundled need assessments. The Commission should require IOUs to remove direct access and CCA load from their bundled load forecasts to prevent over-procurement and reduce the likelihood of unnecessary stranded costs.

For example, in PG&E’s Phase 1 General Rate Case application (A.09-12-020), PG&E shows direct access load declining both in absolute and percent-of-load served terms. From 2009 to 2011, PG&E’s forecast shows direct access load decreasing by 448,124 MWhs per year, or a decrease from 6.68% of total load to 6.07% of total load. However, the passage and

⁴ Id at p. 10.

implementation of California Senate Bill (SB) 695 allows for a partial re-opening of direct access to new customers and D.10-03-022 states that PG&E shall phase in an additional 3,946 GWhs of direct access load over four years (2010-2013). Given the phase-in schedule adopted by D.10-03-022, it is far more reasonable to forecast that DA load will increase rather than decrease and that therefore PG&E's bundled procurement requirements will decrease accordingly. The corollary to this recommendation is that the Commission should adopt the principle that the IOUs are required to procure new generation to meet their own forecast load growth as part of their "obligation to serve" and that they are obligated to manage the procurement variations that results from changes in their own load forecast. In this regard, the California Energy Commission has stated in its 2009 Integrated Energy Policy Report ("IEPR") that it will be providing a "supplemental analysis that disaggregates the 2009 IEPR planning area forecasts into bundled and direct access segments."⁵ This supplemental analysis should be taken into account in Track II of this proceeding.

III. Track III – Rule and Policy Issues

WPTF's comments with respect to Track III relate to the eight issues preliminarily determined to be within scope pursuant to the PSM. WPTF also suggests other issues that should be considered within Track III.

1. Updates to Procurement Rules to Comply with SB 695 and Refinements to the D.06-07-029 Cost Allocation Methodology (CAM)

This is a fundamental competitive market issue, and this proceeding should be the venue that determines how SB 695 will be applied going forward. It is important to adopt a uniform standard and policy for defining and implementing the cost allocation requirements of SB 695

⁵ 2009 *Integrated Energy Policy Report, Final Committee Report*, California Energy Commission, December 2009, p. 50.

that can be easily understood and applied in all individual applications and proceedings. Otherwise, inefficient and potentially conflicting standards and protocols could arise, creating market confusion and uncertainty.

2. Clarification / Refinement of Existing Procurement-Related Requirements in Support of the Development of a Procurement Requirements Summary Document (a.k.a. “Rulebook”)

The PSM states that a Staff draft of a procedural requirements summary or Rulebook will be distributed by separate ruling shortly after issuance of the OIR and that the timetable will include at least one workshop and an opportunity for comments and responses to the draft. Footnote 27 also provides that, “While this document is known informally as the ‘Rule Book,’ its final implementation may be in one of several different forms, including as a General Order.”⁶ Subsequently, a June 2 ruling was issued that provided more detail on this topic.⁷

WPTF offers two observations. First, this effort could be a drain on Commission and party resources going forward, as it is difficult to envision in advance every procurement-related issue that may arise. As new issues arise, the Rule Book will then need to be revised to accommodate these new developments, which will be a further drain on time and expenses. Second, a rulebook doesn’t have the force of a decision. While the proposed rulebook may be a compilation of laws and rules from previous Commission decisions, it will not have the same force and effect of a decision. It therefore makes little sense to go through this effort merely to develop a guidebook that has no legal effect.

Furthermore, the potential exists for conflict between the rulebook and the underlying Commission actions and decisions that are cited therein. Presumably the decisions themselves

⁶ OIR, at p. 15.

⁷ Administrative Law Judge’s Ruling on Procurement Requirements Summary Document (A.K.A. “Rulebook”) – Track III.

prevail in the event of any conflict, but WPTF questions why we should go through this effort just to create the potential for future disputes and conflicts. Converting the Rule Book into a General Order with which all IOUs must comply makes more sense, but the Commission will retain greater flexibility and avoid unnecessary future dispute resolution efforts if it simply maintains its current policy of reviewing the IOUs' procurement plans on a regularly scheduled basis and dealing with new procurement-related policy and/or administrative issues as they arise.

3. Procurement Rules to Comply with OTC Policies

WPTF agrees that this topic should be in the scope of the docket and supports consideration of the associated issues. In adopting a policy to substantially reduce the use of once-through cooling on May 4, 2010, the State Water Resources Control Board relied on a plan that the Commission developed in concert with the California Independent System Operator Corporation ("CAISO") and the California Energy Commission ("CEC") (the "Energy Agencies") to modify existing planning and procurement processes.⁸ That proposal recognizes that while some plants may be retired, a systematic process is necessary since capacity should not be allowed to retire until reliable replacement capacity is operational. Therefore, before pursuing any policies "encouraging retirement of OTC units" the Commission should first assure that it has made the essential changes to the LTPP process to fulfill the purposes already agreed upon among the Energy Agencies. WPTF recommends that the procurement plan process in Track II should require each affected utility to look at the expected unit cessation dates, and identify where the capacity in question is required for system or local needs so that new build and repowerings/refurbishments can compete head to head when the IOUs conduct RFPs as authorized by this LTPP proceeding.

⁸ <http://www.energy.ca.gov/2009publications/CEC-200-2009-013/CEC-200-2009-013-SD.PDF> ("OTC Report").

The scope should further recognize that many OTC units have locational characteristics and operational characteristics that facilitate the integration of renewable resources and that these characteristics have not been fully considered in bid assessments. Because of these units' characteristics, the IOUs may require more refined analytic tools to assess the replacement of OTC units. The Commission has also expressed a preference for brownfield development that needs to be considered in conjunction with the Water Board's policy on OTC.⁹

4. California Independent System Operator Corporation Market - Related Procurement Implementation Issues –

The OIR states there should be, “particular focus on the upfront standard for IOU procurement activity in CRR and convergence bidding (“CB”) markets.”¹⁰ Furthermore, WPTF strongly recommends that if the Commission plans to utilize this proceeding to determine how the IOUs will participate in CB, it needs to move expeditiously to wrap up that aspect of the process well in advance of February 1, 2011 implementation date for convergence bidding.

5. Refinements to Bid Evaluation in Competitive Solicitations (particularly with respect to UOG Bids)

From WPTF's perspective, this is one of the most important elements in the OIR. The risk profiles of IOU ownership and contracts with independent power producers (“IPPs”) are completely different, which makes bid evaluation particularly difficult. RFO competition between utility-owned generation (“UOG”) and IPP projects inevitably gets entangled by such issues as identifying ratepayer subsidies that have supported the utility's generation development and the longer life cycles ascribed to UOG that lower average costs when compared to a ten-year

⁹ See, D.04-12-048, at p. 159: “It is generally good policy to consider brownfield sites before developing greenfield sites, because of existing infrastructure, being close to load centers, and many other benefits. Therefore, we direct the IOUs to consider the use of brownfield sites first and take full advantage of their location before they consider building new generation on greenfield sites. If IOUs decide not to use brownfield, they must make a showing that justifies their decision.” See also AB 1576, Statutes of 2005.

¹⁰ OIR, at p. 16.

PPA. WPTF continues to believe and recommend that UOG projects should not be an option and that the current hybrid market is inefficient and costly to ratepayers. We also offer three recommendations with regard to the scope of this issue.

First, need should be redefined to reflect any need that is not hedged with ownership or contracts covering the relevant terms, i.e., IOUs should not be allowed to presume that existing resources will remain under contract to serve their loads. Long-term solicitations should be restructured accordingly to allow the participation of both new and existing resources.

Second, the process for evaluating projects and/or contracts offered in the RFO that have different terms must be investigated in this Track III so that there is no artificial bias toward specific projects. For example, comparisons based on levelized net market value may be biased in favor of longer term alternatives (which tend to equate to UOG ownership) because they fail to account for the fact that once a 10-year (for example) PPA rolls off, it may be replaced by shorter-term purchases at prices significantly below the cost of the initial contract.¹¹ Track III should investigate this issue and consider remedial actions to eliminate this unfair aspect of the bid evaluation process.

Third, in performing their market valuations for IPP projects and UOG (or 30 year PSA projects), IOUs should be required to use forward price curves that are consistent with Commission policy when valuing both sets of projects. Current Commission policy depresses capacity compensation below new build levels, but nevertheless sets the value for market based

¹¹ Some relevant aspects of PG&E's valuation methods are described in sections 3.C.1 and 4.F.4 of PG&E's LTRFO testimony that can be found at: https://www.pge.com/regulation/LongTermRFO-Solicitation2008-II/Hearing-Exhibits/PGE/2010/LongTermRFO-Solicitation2008-II_Exh_PGE_20100407-Exh001.pdf

capacity.¹² The impact of this policy, until it is reformed, should be reflected in all capacity valuations to ensure a level playing field.

Finally, the OIR states that issues which may be considered under this topic include the following:

- i. How IOU bid development costs would be addressed (“at-risk” or ratepayer-guaranteed);
- ii. The extent to which penalty and reward components are or should be added to UOG bids to make them consistent with IPP bids;
- iii. What measures should be taken to prevent sharing of sensitive information between utility staff involved in developing utility bids and staff who create bid evaluation criteria and that select the winning bids;
- iv. How failed contracts should be handled within the IOU RFO/procurement process; and
- v. Whether parties might agree on a common set of risk factors better managed by IOUs as compared to IPPs, to simplify the standard terms and conditions in the IOUs’ pro forma contracts and subsequent counterparty contract negotiations.

WPTF concurs with the inclusion of each of these issues in this element of Track III.

6. Refinements to the Timelines Associated with IOU RFOs for RA Products

WPTF concurs that this topic should be included within the scope and will reserve any comments for later filings.

¹² For example, resource adequacy rules limit the obligation of LSEs to purchase local resource adequacy at prices above \$40/kW-year. This limit was established in section 3.3.12 of D.06-06-064: http://docs.cpuc.ca.gov/word_pdf/FINAL_DECISION/57644.doc

7. GHG Compliance Products and Risk Management Strategies

WPTF concurs that this topic should be included within the scope and will reserve any comments for later filings.

8. Other Procurement Rule Changes

a. Refinements to the Independent Evaluator Process

The OIR provides that “refinements to Independent Evaluator (“IE”) guidelines” is an area for which procurement rule changes may be necessary.¹³ WPTF does not disagree, but believes that the more important issue in this area is independent evaluation process transparency. This proceeding should be the forum for a serious discussion on how to make the RFP evaluation process more transparent, based on standardized bid parameters. WPTF continues to believe that any putative “independence” of the IEs is clearly compromised by having them selected and paid by the same utilities whose procurement activities they are required to evaluate. However, it is not sufficient merely to reform the IE selection process, when the fundamental problem with the RFP process is that it lacks standardization with respect to project type and contractual terms and conditions. As result, the evaluation process is subjective and susceptible to manipulation. The entire IE and Procurement Review Group process needs to be reconsidered so that the critical decisions are accomplished with far greater transparency for all market participants.

b. This proceeding should evaluate wholesale load auctions if the Commission declines to do so in the direct access rulemaking.

WPTF also recommends that the Commission should consider broader reforms to utility procurement practices that are necessary to ensure vibrant wholesale and retail competition. There needs to be a full evaluation of load auction procurement practices that are used in many

¹³ OIR at p. 17.

other jurisdictions where there is retail choice. Wholesale load auctions provide mechanisms that allow the IOUs to secure supply from the wholesale markets where many of the risks associated with their default service obligations, including customer attrition risk, energy and capacity price risk, and portfolio risk can be actively managed. Because the design of the default service provided by the IOUs to customers who cannot or do not choose competitive retail service is an integral element of a successful retail choice market, an evaluation of this type of utility procurement needs to be performed.

WPTF has endorsed the recommendation that this issue be considered in the Direct Access rulemaking (R.07-05-025). However, if that request is denied, then the issue should be examined here. The Commission needs to find a home for this orphan issue.

c. The Commission needs to adopt a single load forecast

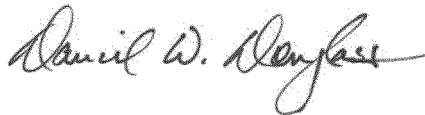
There is a fundamental need for a single, independently-established load forecast for determination of procurement needs, and implementation of resource adequacy requirements that is applied on a consistent basis. Use of such a single forecast facilitates determination of the net short and enables LSEs to engage in rational planning. WPTF recommends utilization of the IEPR forecast, as it meets the need for a single forecast that is independently developed and means that a common forecasting methodology is used for all three IOUs. Furthermore, this approach is consistent with the method adopted by the Commission in D.07-12-052, where the IOU need determination tables were based on the CEC's base case, 1 in 2 summer temperature demand forecast, using the forecasts from CEC's 2007 IEPR.

Stated succinctly, there is no need for more than one load forecast. Moreover, allowing multiple LSE forecasts all based on different criteria and contingencies will undermine the ability of investors, buyers and sellers to assess the market and make investment decisions. In addition, it conflicts with the Commission's view in D.07-12-052 that uniform planning criteria,

such as a single load forecast, uniform application of standard capacity counting protocols, and a planning reserve margin are the best approach to support a competitive, market-first, procurement process.

Finally, as WPTF has repeatedly pointed out, to the best of its knowledge, every single organized market uses a single load forecast, a consistent resource counting protocol and reserve margin. These markets all have well-defined and transparent protocols for determining if any element of the load forecast process or assumptions should be modified. WPTF therefore recommends that the Commission confirm that the CEC load forecasts developed during the IEPR process should be utilized by the Commission and regulated utilities for determination of LTPP procurement need.

Respectfully submitted,



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June 4, 2010

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing *Comments of the Western power Trading Forum on Preliminary Scoping Memo* on all parties of record in R.10-05-006 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 June 4, 2010, at Woodland Hills, California.



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