

**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.

Rulemaking 10-05-006
(Filed May 6, 2010)

**COMMENTS OF NRG ENERGY, INC. ON THE PRELIMINARY
SCOPING MEMO**

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Date: June 4, 2010

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In accordance with the Order instituting this rulemaking, NRG Energy, Inc. (NRG) submits its comments on the Preliminary Scoping Memo and Schedule for this proceeding on the long-term procurement plans (LTTPs) of the investor-owned utilities (IOUs).

The Preliminary Scoping Memo maps out three separate tracks for this proceeding. Track I will consider the resources needed to meet all of the load located within the service territories of the IOUs, including direct access and community choice aggregation loads not served by the IOUs (referred to as the “resource plan”). Track II will consider the resources needed to meet the bundled load of each of the IOUs (referred to as the “procurement plan”). Track III is designated as the forum for considering rule changes and policy issues.

I. INTRODUCTION

NRG is in a unique position to comment on the scope of the LTTP proceeding proposed by the CPUC by virtue of its diverse portfolio and development initiatives in California. NRG currently: (1) owns existing Once-Through-Cooling (OTC) gas resources located in load pockets; (2) is actively engaged in green-field and brown-field development of

gas resources; and (3) is one of the leading developers of solar resources in California, with over 500 MW currently in development.

NRG files these comments to emphasize the need for the CPUC to adopt reasonable underlying assumptions regarding *existing* generation resources, and to point out how the decisions the CPUC makes in this proceeding will determine whether current gas-fired generation resources will continue to operate in the California market over the course of the time period under consideration in this proceeding. For example, the ISO/RTO Council's 2009 State of the Markets Report found that many gas-fired units are *not* currently recovering their fixed costs via the current market.¹ NRG's own experience does not contradict this finding – its generating facilities – those facilities located within critical load pockets – are not seeing revenues that justify the continued operation of these plants.

This experience highlights the need for the CPUC to consider three questions as part of Track I of the LTPP proceeding:

1. How much capacity do utilities need to procure to ensure reliability, based on a realistic assessment of current gas-fired resource retirements?
2. What steps can the CPUC take to ensure sufficient revenue streams exist in the market in order to ensure that sufficient resources remain viable and operational during the time period envisioned in this proceeding?
3. What steps can the CPUC take to incent utilities to enter into financeable contracts in order to encourage development of new efficient gas-fired resources necessary to balance increased renewable penetration?

Unless the CPUC takes steps to ensure that existing facilities are being provided a reasonable opportunity to secure the revenues needed to cover their costs, it is not reasonable to assume that

¹ 2009 State of the Markets Report, *available at*: <http://www.isorto.org/atf/cf/%7B5B4E85C6-7EAC-40A0-8DC3-003829518EBD%7D/2009%20IRC%20State%20of%20Markets%20Report.pdf>

these facilities will continue operating over the next seven years, particularly given current environmental pressures.

In the last LTPP proceeding, significant policy issues were assigned to Phase II and were ultimately not addressed. In the rush to develop and approve the IOUs' LTPPs, the Commission should recognize that the policy issues identified by NRG are not merely academic points that can be contemplated at leisure. These issues are crucial to the construction of a rational procurement system that is able to meet the short- and long-term electricity needs of California.

II. COMMENTS

A. The Goals of the LTPP Process

This proceeding should consider the following broad goals:

ffi Policies and practices should be aligned to achieve a balance of grid reliability requirements, ratepayer costs, and environmental objectives.

These three key factors must be considered at each step of the development of LTPP policies and practices. Overemphasis of any one factor will lead to problems in the other areas. In particular, the Commission should not lose sight of the need to maintain a reliable grid as it pursues the state's environmental goals and seeks to keep rates at reasonable levels.

ffi Forecasts should be based on a realistic assessment of key variables. The *desire* to accomplish a particular policy goal should not lead to forecasts that unrealistically assume that the goal has been or will be achieved. In particular, the development of the LTPP must adopt realistic assumptions for both supply and demand.

On the supply side: the LTPP must consider whether existing gas-fired

resources are likely to remain in a market that is not adequately compensating them for their fixed costs of operation.² The LTPP needs to consider methods of appropriately compensating such resources, or must require the procurement of far more new resources than are currently contemplated to make up for the inevitable shortfall. Further, plants being required to retire or repower by the advent of Once-Through Cooling rules need to be provided the opportunity to compete with new generation resources to meet the system requirements. Confronted with restrictions on OTC, existing OTC plants will either retire or make the additional investments required to operate in compliance with those restrictions. Plants that choose to make those investments should be provided a fair opportunity to compete for contracts to meet the needs identified in the Track I resource plans and Track II procurement plans.

On the demand side: the LTPP should reflect a realistic view of future demand that derives from the effects of the penetration of new technologies, including electric vehicles. For example, recent joint study by KEMA and the ISO/RTO Council estimated that California could see the integration of 267,000 electric vehicles over the next five years, with Los Angeles alone seeing over 110,000 new electric cars over the same time period.³ In total, the

² 2009 State of the Markets Report, *available at:* <http://www.isorto.org/atf/cf/%7B5B4E85C6-7EAC-40A0-8DC3-003829518EBD%7D/2009%20IRC%20State%20of%20Markets%20Report.pdf>

³ *See Assessment of Plug-in Electric Vehicle Integration with ISO/RTO Systems, available at:* http://www.isorto.org/atf/cf/%7B5B4E85C6-7EAC-40A0-8DC3-003829518EBD%7D/IRC_Report_Assessment_of_Plug-in_Electric_Vehicle_Integration_with_ISO-RTO_Systems_03232010.pdf

KEMA-ISO/RTO Council study finds that electric vehicles alone could drive the need for almost 1,500 MW of new capacity in California. The LTPP proceeding must include these load-drivers in its procurement analysis.

ffi **The LTPPs should reflect a realistic view of the cost and availability of resources to serve future demand in load pockets.** Neither the prices offered under the Commission's Local Resource Adequacy program nor the Locational Marginal Prices offered under the Market Reform and Technology Update (MRTU) market structure of the California Independent System Operator (CAISO) provide sufficient revenues to support investment in new generation in congested load pockets. Without access to adequate sources of revenue, these older units are unlikely to remain in the market, particularly given the environmental constraints currently faced by many coastal units. As the older units that are now relied on to maintain grid stability retire, a way to stimulate investment in new generation in these key locations must be found, and this critical issue should be included as part of Track 1 of the LTPP proceeding.

ffi **The LTPPs should reflect a realistic view of the impact of renewable generation on the grid and the expected role of existing and new non-renewable generation to support RPS implementation.** NRG is a leading developer of solar resources, as well as an owner/operator of gas-fired facilities. NRG recognizes that the integration of renewable energy resources creates great promise in California, but also poses operational challenges. There is no question that maintaining reliability requires a diverse mix of

resources, including both renewable and fast-start gas-fired resources. The LTPP proceeding should recognize that these operational challenges require that California take immediate steps to retain existing gas-fired resources. NRG submits that the existing market construct and state policy do not provide these resources with adequate compensation, and that many resources – including NRG’s resources located in load pockets throughout Southern California – are not likely to remain active in such a market. Thus, the LTPPs must clearly recognize the role that existing and new non-renewable generation will play in helping California meet its RPS goals and address how the CPUC will address the considerable operational challenges associated with integrating 33 percent renewables without providing new and existing gas-fired resources additional compensation that make them economically viable. **ffi**

ffi Base case assumptions should be realistic and should be critically examined. The LTPP proceeding should closely consider the basic topography of the system, especially as it relates to existing generation (such as OTC units). Given the points raised above with respect to compensation of existing resources, what asset mix is assumed to be operational? This examination will establish the foundation for future procurement policy. Because the market is not currently providing sufficient revenues to justify the participation of existing resources, it is not reasonable to assume that these resources will continue to operate. Without a realistic assessment of resource

availability in 2012-2020 time frame, the Commission **cannot** accurately determine the system procurement needs.

B. The Challenges Confronting the Commission in this Proceeding

In striving to meet the goals listed above, the Commission will confront several challenges:

- ffi **The disconnect between energy, air, water and land environmental policies.** Agencies with different subject matter jurisdiction have adopted policies that will force the retirement of existing generation while simultaneously limiting or complicating the development of replacement generation. The state's policies need to be aligned, and the reliability of the electric grid should have a high (if not the highest) priority among conflicting goals.
- ffi **The need to develop a market structure that supports the goals of the state's policies.** Policy makers currently seem to assume that existing generators are being sufficiently compensated to remain competitively viable. Currently, however, there is little financial incentive for investment in new natural gas capacity with the operating and locational attributes needed to support the state's RPS goals or to maintain grid reliability. Achieving the 33% RPS goal will be a hollow accomplishment if reliability suffers as a result. Similarly, current markets for capacity do not support the continuing operation of older existing units, and the nodal market does not allow a generator to recover anything above its cost as calculated by the CAISO (which does not match actual costs) plus 10%. The current focus on the

development of renewable resources to meet RPS goals, combined with the potential penalties the IOUs face for failing to meet the goals, has the effect of diverting development capital and procurement priorities away from the construction of new non-renewable resources that will be essential to integrate into the grid without operational disruptions. A rational procurement policy must ensure revenue sufficiency for non-renewable resources that are needed to complement and integrate renewable projects.

ffi **Accounting for the time needed to contract, design, permit and construct new and repowered resources, including transmission resources.** Demand can grow quickly, especially during the recovery from an economic recession, while permitting and constructing new or repowered generation or transmission resources in California can take years.

III. CONCLUSION

In the push to reach California's RPS goals, it is easy to overlook the fact that even when the 33% RPS goal is achieved, up to 67% of California's electricity will come from non-renewable sources. The challenge the Commission faces in this LTPP proceeding is to ensure that the transition to 2020 is made smoothly and cost-effectively, with no adverse effects on reliability. New and existing gas-fired plants can and should play a central role in this transition and in supporting the increasing proportion of renewable resources in California's portfolio.

Existing gas-fired resources will not continue in operation, and investment in new or repowered gas-fired resources will not be made, however, unless the plants have a reasonable opportunity in the market structure to cover their costs. In this LTPP proceeding, the Commission can take significant steps toward creating a framework in which economically

competitive and environmentally sensitive generation resources can continue to contribute to meeting the electricity needs of Californians, supporting the integration of an increased penetration of renewable resources, and the achievement of California's policy goals.

In these comments, NRG has offered its view of some additional issues the Commission should consider in this proceeding to address the challenges of the next decade. NRG respectfully urges the Commission to consider these comments as it develops the Scoping Memo and maps out the issues to be addressed in this proceeding.

Respectfully submitted this 4th day of June, 2010 at Princeton, New Jersey.

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By

/s/ Abraham Silverman
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CERTIFICATE OF SERVICE

I, Melinda LaJaunie, certify that I have on this 4th day of June 2010 caused a copy of the foregoing

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to be served on all known parties to R.10-05-006 & R.08-02-007 listed on the most recently updated service list available on the California Public Utilities Commission website, via email to those listed with email and via U.S. mail to those without email service. I also caused courtesy copies to be hand-delivered as follows:

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 4th day of June 2010 at San Francisco, California.

/s/ Melinda LaJaunie
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