

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

Rulemaking Regarding Whether, or Subject
to What Conditions, the Suspension of Direct
Access May Be Lifted Consistent with
Assembly Bill 1X and Decision 01-09-060.

Rulemaking 07-05-025
(Filed May 24, 2007)

**MOTION OF DIRECT ACCESS CUSTOMER COALITION, CALIFORNIA STATE
UNIVERSITY, ALLIANCE FOR RETAIL ENERGY MARKETS, CITY AND COUNTY
OF SAN FRANCISCO, MARIN ENERGY AUTHORITY, SAN JOAQUIN VALLEY
POWER AUTHORITY, CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION,
ENERGY PRODUCERS AND USERS COALITION, CALIFORNIA LARGE ENERGY
CONSUMERS ASSOCIATION, AND CALIFORNIA MANUFACTURERS &
TECHNOLOGY ASSOCIATION TO CREATE
A SEPARATE EXPEDITED PHASE IN THIS PROCEEDING TO REVIEW
AND ADDRESS THE FLAWS IN THE METHODOLOGY TO
DETERMINE NON-BYPASSABLE DEPARTING LOAD CHARGES**

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AND ON BEHALF OF THE JOINT PARTIES

September 23, 2010

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I. INTRODUCTION AND SUMMARY

Pursuant to Rule 11.1 of the Commission’s Rules of Practice and Procedure, the Direct Access Customer Coalition (“DACC”), the California State University, the Alliance for Retail Energy Markets (“AReM”), the City and County of San Francisco (“CCSF” or “City”), the Marin Energy Authority (“MEA”), the San Joaquin Valley Power Authority (“SJVPA”), the California Municipal Utilities Association (“CMUA”), the Energy Producers and Users Coalition (“EPUC”), the California Large Energy Consumers Association (“CLECA”) and the California Manufacturers & Technology Association (“CMTA”) (the “Joint Parties”)¹ submit this motion for a new expedited phase in this proceeding to promptly review and if necessary modify the methodology used to calculate non-bypassable departing load charges. At a

¹ Attorneys for CSU, CCSF, SJVPA, CMUA, EPUC, CLECA and CMTA have indicated to Mr. Douglass that he may represent that these parties join in and support this motion.

minimum, the Joint Parties seek review and revision of non-bypassable departing load charges to account for the value of renewable resources, California Independent System Operator (“CAISO”) services and portfolio shape and load factor.

Granting this motion will ensure that important issues related to the calculation of non-bypassable departing load charges are addressed promptly and in a manner that allows all interested parties, including each of the jurisdictional investor owned utilities (“IOUs”), fair notice and an opportunity to participate.

II. IDENTIFICATION OF JOINT PARTIES

The parties to this motion represent a broad spectrum of entities that are unified in their concerns about the current methodology used to determine non-bypassable departing load charges. The parties to this Motion are as follows:

- Direct Access Customer Coalition. DACC is a coalition of educational, commercial and industrial customers that utilize direct access for all or a portion of their retail electricity demand. DACC members believe that the current Power Cost Indifference Adjustment (“PCIA”) and the Competition Transition Charge (“CTC”) calculation methodology is a burden on retail competition that unfairly shifts costs to direct access customers.
- California State University. The California State (“CSU”) is the largest public higher education system in the U.S., and a major energy consumer in California. The CSU has been a participant in California’s DA market since its inception in the state in 1998. Through DA, CSU has saved the state millions of dollars while being recognized as one of the foremost green college institutions by the Environmental Protection Agency for college & university green power purchases. The CSU respectfully requests the

Commission open a phase within the current proceeding to determine how the inequitable PCIA and CTC charges can be corrected so as to eliminate any cross subsidization of rate payers.

- Alliance for Retail Energy Markets. AReM is a California mutual benefit corporation whose members are electric service providers that are active in California's direct access market. AReM is concerned that the benefits of retail competition in California are burdened by a PCIA and CTC that disproportionately shift bundled utility customer costs onto the customers that seek alternative energy service.
- The City and County of San Francisco. The City is pursuing a Community Choice Aggregation ("CCA") program, the CleanPowerSF program. The City seeks fair departing load charges that do not unfairly burden CCA customers. On behalf of the businesses and residents of San Francisco that remain bundled customers, the City seeks true customer indifference to departing load.
- Marin Energy Authority. MEA launched electricity service to customers of its Marin Clean Energy CCA program in May 2010. The unbalanced PCIA and CTC calculations have significant negative impacts on the operations of Marin Clean Energy. MEA seeks an equitable calculation of these charges such that bundled customers are indifferent, not benefitted.
- California Municipal Utilities Association. CMUA is an industry association representing California's publicly owned utilities. CMUA has actively participated in R.02-01-011 and R.06-02-013 in regard to the Commission's determination of the scope and applicability of the Cost Responsibility Surcharge ("CRS") to so-called municipal departing load.

- San Joaquin Valley Power Authority. SJVPA is a joint powers agency among Kings County and several cities in the Greater Fresno region of the San Joaquin Valley. SJVPA was formed for the purposes of addressing regional energy issues and implementing a CCA program. In June 2009, SJVPA temporarily suspended its CCA program amidst ongoing opposition from Pacific Gas and Electric Company (“PG&E”).
- Energy Producers and Users Coalition. EPUC is an ad hoc group representing the electric end use and customer generation interests of the following companies: Aera Energy LLC, BP America Inc. (including Atlantic Richfield Company), Chevron U.S.A. Inc., Shell Oil Products US, Exxon Mobil Corporation, THUMS Long Beach Company, and Occidental Elk Hills, Inc. As a coalition with end-user customer interests, customer generation departing load interests, and CHP generator interests, EPUC believes that the PCIA and CTC should be calculated so as to provide true customer indifference and favor neither bundled nor departing customers.
- California Large Energy Consumers Association. CLECA is an organization of large industrial electric customers of PG&E and Southern California Edison Company (“SCE”). These companies are in the steel, cement, industrial gas, pipeline, and beverage industries. Some are on bundled rates and some take direct access (“DA”) service. They are all electricity-intensive, in highly competitive industries, and sensitive to the level of electric rates. CLECA believes that the PCIA and CTC should be calculated so as to provide true customer indifference and favor neither bundled nor DA or CCA service.
- California Manufacturers & Technology Association. CMTA is a trade association with over 600 member companies which have operations in the manufacturing and technology areas in California. All three of the IOUs provide either bundled or direct access service

to CMTA members. As a representative of both bundled and direct access customers, CMTA has an interest in ensuring that the PCIA and CTC charges are fair and do not unduly burden either class of customers.

III. DISCUSSION

A. The current method for determining non-bypassable departing load charges is flawed and requires correction.

The Commission has recognized that the method for calculating non-bypassable departing load charges could require changes as experience is gained with its implementation. In Decision (“D.”) 08-09-012, the Commission recognized that the method for determining non-bypassable departing load charges might need to be addressed in future proceedings to accommodate changing market conditions and other factors. *Id.* at 56-57. The Commission stated “[i]f, due to future changing circumstances, the processes adopted by this decision for determining the D.04-12-48 [non-by-passable charge (“NBC”)] become unworkable, unbalanced, or unfair, parties may propose and request modifications to the form of the NBC or how the NBC should be determined or calculated.” *Id.*, Ordering Paragraph 8. The Joint Parties believe that the current methodology for determining non-bypassable departing load charges has become unbalanced and unfair, and does not result in bundled customer indifference to departing load. Instead, the calculation now benefits bundled customers to the detriment of non-bundled ratepayers. Thus, consistent with prior Commission direction, flaws in the methodology must be addressed and corrected to restore genuine bundled customer indifference.

Substantial flaws in the calculation of non-bypassable departing load charges were identified in 2008 in a petition for modification of D.07-01-025 filed by the City of

Victorville in Rulemaking (“R.”) 03-10-003, the rulemaking related to CCA. The issue was addressed again more recently in testimony filed by CCSF and MEA in Application (“A.”) 10-05-022 (PG&E’s Energy Resource Recovery Account application).² The flaws in the calculation of non-bypassable departing load charges unfairly burden DA customers, CCA customers, transferred municipal departing load customers, new municipal departing load customers, split-wheeling departing load customers, and new WAPA departing load customers.

A key concern is that the market price benchmark used to determine non-bypassable departing load charges, in accordance with prior Commission decisions D.06-07-030, D.07-01-025, D.07-01-030 and D.08-09-012, does not provide for bundled customer indifference, as follows:

- The current formula for the Market Price Benchmark used to determine non-bypassable departing load charges results in a Market Price Benchmark that is too low. As currently formulated, the Market Price Benchmark is well below prices for recent sales and purchases of renewable and non-renewable resources.
- The Market Price Benchmark does not reflect the value of renewable resources even though the cost of these resources is included in the IOU costs used to calculate non-bypassable departing load charges.
- The Market Price Benchmark does not reflect a component for CAISO services even though the cost of these services is included in the IOU costs used to calculate the non-bypassable departing load charges.

² The relevant testimony of CCSF and MEA was stricken in docket A. 10-05-022.

- The Market Price Benchmark does not reflect the value of the delivery profile of the resources even though the delivery profile of the resources is reflected in the IOU costs used to calculate the charges.
- As implemented, the Market Price Benchmark causes non-bypassable departing load customers to pay twice for Renewables Portfolio Standard (“RPS”) electricity – once through the Market Price Benchmark while not receiving any renewable attribute associated with the cost, and once through each entity’s own procurement in compliance with the RPS.
- Finally, the Market Price Benchmark causes departing load customers to pay a stranded cost for IOU renewable procurement that is not at all stranded, since any excess renewable procurement by the IOUs that is created by departing load may be banked for future compliance.

Information from PG&E’s ERRRA proceeding illustrates that these distortions are significant. Publicly available prices for recent wholesale electricity transactions, including for renewable and non-renewable resources, are well above the Market Price Benchmark used pursuant to the current methodology to value PG&E’s portfolio. The average cost of renewable resources procured this year by PG&E is over three times the Market Price Benchmark. Despite the IOUs having not yet achieved the RPS requirements, the Market Price Benchmark methodology yields additional “stranded costs” included in non-bypassable departing load charges each time the IOUs execute a contract for renewable energy. Moreover, even when and if IOU procurement reaches the prescribed targets, and departing load creates excess procurement, the costs are not stranded because the RPS program allows the IOUs to bank excess procurement for future compliance periods. Correcting

significant distortions in the calculation of non-bypassable departing load charges is time critical. This year, MEA became the first CCA to commence serving customers, and CCSF intends to commence serving customers in 2011. Commencing a CCA program at a time when inaccurate non-bypassable departing load charges significantly skew the competitive landscape severely disadvantages CCA programs and could greatly reduce the benefit of the opt-out approach included by the legislature in AB 117.

Similarly, after years of a moratorium on new direct access, D.10.03-022 authorized and implemented a plan for increased limits in the allowed level of DA transactions within the service territories of California's three major investor-owned electric utilities. Subject to a cap, the decision authorized a four-year phase-in period, commencing in 2010. This reopening of DA was met with exceptionally higher customer interest, with all available capacity subscribed within approximately one minute of the times established for customers to file notices of intent to return to direct access. Thus, while the skewed competitive landscape that this issue creates has been a problem for DA for many years, the timely review and correction of the methodology for the calculation of non-bypassable departing load charges is increasingly critical.

B. A separate expedited phase to promptly address the calculation of non-bypassable departing load charges is appropriate.

As stated above, Commission decisions have acknowledged that the methodology for calculation of non-bypassable departing load charges could require modification over time. Commission decisions suggested that issues related to the calculation of non-bypassable departing load charges should be addressed in Energy Resource Recovery Account ("ERRA") proceedings. See D. 08-09-012; Resolution E-4256 regarding CCA CRS at 23 (May 6, 2010). Nonetheless, in A. 10-05-022, PG&E's most recent ERRA proceeding, the Administrative

Law Judge struck testimony related to the calculation of non-bypassable departing load charges on the grounds that the issues should be addressed in a forum open to all utilities and parties interested in or affected by the issues. See Administrative Law Judge's Ruling Granting Motion to Strike at 2 (August 31, 2010).

Although the Assigned Commissioner and presiding ALJ in this proceeding earlier rejected the idea of a full exit fee review in this proceeding, they left the door open for an examination at a future date:

We understand that the concerns raised regarding the various non-bypassable charges involve important issues that could significantly impact the success or failure of DA in the longer term. Given the immediate workload priorities for this phase of this proceeding, however, we will defer consideration of this issue at this time. We will re-evaluate how the DA non-bypassable charges are determined at a future time.³

The same ruling set forth a procedure whereby parties would engage in further discussions and workshops on issues such as switching rules, ESP financial security arrangements, an update to the Temporary Bundled Service rate, DA process improvements and ensuring compliance with uniform requirements. Since that time there have been several meetings and workshops on these issues, the most recent having been held on September 20. Progress is being made and it would not be burdensome for parties next to explore the issues discussed in this motion, especially since the request here is for a more limited "surgical" review of the non-bypassable departing load charge as opposed to a broader examination of all exit fee issues.

The Joint Parties seek a further phase in this proceeding because, 1) the calculation of non-bypassable departing load charges is a key issue related to the reopening of direct access;

³ June 15, 2010, Assigned Commissioner and Administrative Law Judge Ruling Clarifying Scope and Scheduling Further Proceedings, at p. 10.

2) this proceeding is a rulemaking that is open and under way; 3) this proceeding already includes many of the key interested parties, including the IOUs, representatives of direct access customers and representatives of bundled customers; and 4) notice of a further phase could be served to the service lists of proceedings affecting remaining impacted customer groups and entities, including CCA suppliers and customers, municipalities, and potential municipal departing load customers.

The Joint Parties recognize that corrections to the methodology for calculating non-bypassable departing load charges affect departing load customers beyond DA customers. However, additional customers can be given notice and an opportunity to intervene. During the past several years, issues related to the calculation of non-bypassable departing load charges have alternately been addressed in DA and CCA proceedings, and then made applicable to all customers. Provided adequate notice is given to all potentially affected parties, addressing the issue in this proceeding makes sense for the reasons outlined above. Accordingly, the Joint Parties request that the Administrative Law Judge issue a ruling instituting a further expedited phase in this proceeding to address the flaws in the calculation of non-bypassable departing load charges. Because timing is critical, the ruling should provide for an expedited schedule that results in a decision within no more than six to nine months.

Finally, the Joint Parties anticipate that the IOUs may argue this motion constitutes a collateral attack on prior Commission decisions and that the issues raised in the motion should be presented in petitions to modify the prior Commission decisions establishing the methodology for the calculation of non-bypassable departing load charges. This argument is inapposite in the context of explicit acknowledgement in prior Commission decisions that the

methodology could require revision in the future, and inviting parties to propose revisions should non-bypassable departing load charges become unbalanced or unfair. See D.08-09-012, Ordering Paragraph at 8.

C. Notice of this new phase should be provided to a wide group of stakeholders.

Correction of the methodology for calculating non-bypassable departing load charges may be of interest to a broader group of stakeholders than those that are currently parties to this proceeding. This is, in fact, in accordance with the recommendation of PG&E in its motion to strike filed in the ERRA proceeding mentioned previously. PG&E stated that, “Logically, and legally, any challenge to or revision of those formulas should be in a multi-party proceeding with notice to and participation of all parties affected by the changes.” See PG&E Motion to Strike at 4 (August 24, 2010). Accordingly, the Joint Parties recommend that the Commission give notice of this separate phase to the wide group of stakeholders and invite interested parties to intervene in the new phase. In particular, a ruling establishing a new phase should be served on the service lists in the following proceedings:

Rulemaking 02-01-011, Order Instituting Rulemaking Regarding the Implementation of the Suspension of Direct Access Pursuant to Assembly Bill 1X and Decision 01-09-060

Rulemaking 03-10-003, Order Instituting Rulemaking to Implement Portions of AB 117 Concerning Community Choice Aggregation

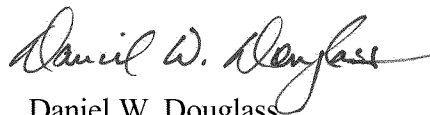
Rulemaking 06-02-013, Order Instituting Rulemaking to Integrate Procurement Policies and Consider Long-Term Procurement Plans⁴

⁴ This motion has been served to each of these service lists so as to provide advance notice to these parties.

IV. CONCLUSION

For the reasons detailed in this motion, the Joint Parties respectfully move the Commission to 1) issue a ruling creating a separate expedited phase in this proceedings to modify the methodology used to calculate departing load charges; 2) provide in that ruling that any changes to the calculation of non-bypassable departing load charges will apply to all applicable departing customers; and 3) give notice of establishment of this separate phase and an opportunity to intervene to the wide group of stakeholders on the service lists in Rulemaking 02-01-011, Rulemaking 03-10-003, and Rulemaking 06-02-013.

Respectfully submitted,



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AND ON BEHALF OF THE JOINT PARTIES

September 23, 2010

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of *Motion of Direct Access Customer Coalition, California State University, Alliance for Retail Energy Markets, City and County of San Francisco, Marin Energy Authority, San Joaquin Valley Power Authority, California Municipal Utilities Association, Energy Producers and Users Coalition, California Large Energy Consumers Association, and California Manufacturers & Technology Association to Create A Separate Expedited Phase in this Proceeding to Review and Address the Flaws in the Methodology to Determine Non-Bypassable Departing Load Charges* on all parties of record in proceedings *R.07-05-025, R.02-01-011, R.03-10-003 and R.06-02-013* by serving an electronic copy on their email addresses of record and by mailing a properly addressed copy by first-class mail with postage prepaid to each party for whom an email address is not available.

Executed on September 23, 2010, at Woodland Hills, California.



Michelle Dangett

SERVICE LISTS – R.07-05-025, R.02-01-011, R.03-10-003, and R.06-02-013

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