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**OF THE STATE OF CALIFORNIA**

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| Application of Southern California Edison Company (U338E) for Applying the Market Index Formula and As-Available Capacity Prices adopted in D.07-09-040 to Calculate Short-Run Avoided Cost for Payments to Qualifying Facilities beginning July 2003 and Associated Relief. | A.08-11-001<br>(Filed November 4, 2008) |
| And Related Matters. | R.06-02-013<br>R.04-04-003<br>R.04-04-025<br>R.99-11-022 |

# JOINT REPLY COMMENTS OF THE MARIN ENERGY AUTHORITY, THE ALLIANCE FOR RETAIL ENERGY MARKETS AND THE DIRECT ACCESS CUSTOMER COALITION

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**DIRECT ACCESS CUSTOMER COALITION**

December 13, 2010

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# JOINT REPLY COMMENTS OF THE MARIN ENERGY AUTHORITY, THE ALLIANCE FOR RETAIL ENERGY MARKETS AND THE DIRECT ACCESS CUSTOMER COALITION

In accordance with Rule 14.3 of the Commission's Rules of Practice and Procedure and the "Assigned Commissioner and Administrative Law Judge's Joint Ruling and Amended Scoping Memo for Consolidated Proceedings," dated October 19, 2010, the Marin Energy Authority ("MEA")[1], the Alliance for Retail Energy Markets ("AReM")[2], and the Direct Access Customer Coalition ("DACC")[3] (hereinafter collectively referred to as the CCA/Direct Access Parties) submit these joint reply comments with respect to ALJ Wetzel's proposed *Decision Adopting Proposed Settlement* ("Proposed Decision" or "PD") issued on November 16, 2010, and the *Joint Comments on Proposed Decision Adopting the Qualifying Facility and Combined Heat and Power Program Settlement Agreement,* ("Joint Parties Comments") submitted by the Joint Parties.[4]

[1] The Marin Energy Authority is the not-for-profit public agency formed by the County of Marin and seven other towns and cities that administers the Marin Clean Energy program, a renewable energy alternative to Pacific Gas and Electric Company's retail electric supply service and California's first Community Choice Aggregation ("CCA") program.

[2] AReM is a California mutual benefit corporation formed by Electric Service Providers (ESPs) that are active in California's "direct access" retail electric supply market. The positions taken in this filing represent the views of AReM and its members but not necessarily the affiliates of its members with respect to the issues addressed herein.

[3] DACC is a regulatory alliance of educational, commercial and industrial customers that utilize direct access for all or a portion of their electricity requirements.

[4] Joint Parties include: Pacific Gas and Electric Company, Southern California Edison Company , and San Diego Gas & Electric Company; cogeneration and combined heat and power qualifying facility ("CHP QF") representatives – the California Cogeneration Council, the Independent Energy Producers Association, the Cogeneration Association of California, and the Energy Producers and Users Coalition; and statewide consumer and ratepayer groups – the Division of Ratepayer Advocates and The Utility Reform Network.

## I. INTRODUCTION

There are two separate elements to the Joint Parties Comments. The first element seeks a clarification to the PD with respect the cost recovery obligations that are to be imposed on Electric Service Providers ("ESPs") and Community Choice Aggregators ("CCAs"). The second element seeks to modify the proposed Settlement Agreement ("PSA") with respect to those cost allocation provisions such that the Investor-Owned Utilities ("IOUs") will manage the procurement of all elements of the CHP program on behalf of all ESPs and CCAs – a modification that the Joint Parties tortuously seek to justify on the grounds that the new provisions will better serve ESPs and CCAs while reducing administrative burden on Commission staff. The CCA/Direct Access Parties address each of these elements in the sections that follow, and show why the Joint Parties Comments make it even clearer that the provisions of the PSA that impact ESPs and CCAs should be eliminated.

## II. REPLY COMMENTS

### A. Joint Parties Request for Clarification Shows that the PD Is Not Fully Baked

The Joint Parties request clarification that the PD, if adopted, would indeed require ESP and CCA customers to pay the net capacity costs for IOU procurement to meet the MW Target, and that it would also obligate ESPs and CCAs to manage their own procurement to meet the Emission Reduction Target. The CCA/Direct Access Parties agree with the Joint Parties that the PD does indeed provide for the precise cost allocation/procurement responsibilities for which the Joint Parties seek clarification. However, the fact that Joint Parties need to seek this clarification clearly supports the contention noted by the CCA/Direct Access Parties, as well as City and County of San Francisco ("CCSF"), that the PD, apparently unknowingly, modifies provisions of the PSA that would otherwise require ESP and CCA customers to pay stranded costs of the contracts executed to meet the MW Target pursuant to the existing vintaging cost allocation mechanisms provided for in Decision 08-09-012, and not according to the net capacity cost provisions provided for in SB 695.

The PSA provides for the vintaging cost allocation treatment for the procurement associated with the MW Target. The PD sets aside that provision of the PSA based on a reading of statutory requirements of SB 695 – a reading that at least deserves more fulsome discussion, as explained by the CCA/Direct Access Parties in their opening comments. The Joint Parties jump quickly to endorse the PD's modification, as though this is the cost recovery treatment that they wanted all along, even though they did not provide for it in the PSA. This flip flop by the Joint Parties makes

it abundantly more clear that the provisions of the PSA that affect ESPs and CCAs need further vetting if a CHP Program is to be developed that genuinely balances the interests of all affected parties.

### B. The Joint Parties Proposal to Modify the PSA Must Be Rejected

As noted above, the PD's imposition of net capacity cost allocation for the IOUs' procurement of the MW targets would be a significant change to what the PSA calls for with respect to cost allocation. Apparently, the ALJ's ideas about how to modify the PSA seem to have gotten the Joint Parties thinking about other changes that they would like to make to their supposedly carefully constructed settlement that balances all parties' interests. Specifically, the Joint Parties suggest that the IOUs should procure both the MW Target and Emission Reduction Target on behalf of ESPs and CCAs, under the same net capacity cost allocation mechanism that the PD would impose on the MW Target procurement.

This request must be rejected on several grounds. First, if the Joint Parties want to modify their own PSA, there should be new settlement discussions where the requested modifications can be fully vetted. Under no circumstances, however, should they be allowed to change a fundamental element of the PSA via comments on a PD.

Second, the Commission must reject all statements by the Joint Parties that this recommendation better serves the interests of ESPs, CCAs, or their customers. The fact that the Joint Parties could not see fit to invite ESPs or CCAs even once to settlement discussions that spanned 16 months, belies the utter lack of sincerity with which such statements are offered. Moreover, the Joint Parties are categorically wrong about what the best interests of CCAs and ESPs actually are, as explained further.

Further, in support of their new proposal to procure on behalf of CCAs and ESPs for the duration of the CHP Program, the Joint Parties state: "These entities will not be required to enter into long-term CHP contracts, which can impact their balance sheet, liquidity and debt-equivalence. Instead, the IOUs would take on the responsibility for entering into contracts under the QF/CHP Program and will then pass-through the benefits and costs to the ESPs and CCAs."[5] CCAs are formed and customers choose service from ESPs precisely to ***avoid*** having the IOUs manage their

[5] See Joint Party comments, page 4. The CCA/Direct Access parties note that the Joint Parties suggest that the only benefits to be assigned to ESPs and CCAs under the net capacity costs would be Resource Adequacy ("RA") benefits. In Attachment A of their opening comments, the CCA/Direct Access parties have already noted that if net capacity cost allocation proposed in the PSA as an option for the Emission Reduction Target procurement is implemented, there are likely benefits other than just RA that should accrue to EPS and CCA customers.

procurement, and retail choice laws that implemented Direct Access and Community Choice Aggregation were written to provide those choices. If ESPs and CCAs are forced to accept IOU procurement to meet environmental obligations (or any other obligations) imposed on their customers, then the value of retail choice is significantly diminished. Moreover, such a precedent, applied to other aspects of energy, capacity, environmental requirements would quickly render retail choice meaningless. This is the "unseen agenda" of the utility members of the Joint Parties.

If, despite the clear harm that such a decision would make to retail choice options, the Commission nevertheless rejects the CCA/Direct Access Parties recommendation that the provisions applicable to them be struck from the PSA, certain revisions to the Findings of Fact must be made. Specifically, to ensure the rights and obligations of CCA/Direct Access Parties to manage and execute their own procurement are preserved, the CCA/Direct Access Parties recommend that the PD's "Finding of Fact 21 and 26" should be combined and modified into a single Finding of Fact, as follows:

> For both the MW and GHG targets, specified in Sections 5 and 6 of the Term Sheet attached to the Settlement Agreement, the ESPs and CCAs shall procure their proportionate share of CHP for their own customers as described in Sections 6.3 and 13.1.2.1. In addition, consistent with Section 13.1.2.1, all Departing Load Customers will be required to pay for any above-market costs associated with contracts entered into by an IOU to meet the IOU's GHG Target before the customer departed.

The elimination and replacement recommended above are critical in order to eliminate the potential problems that the contentious issues of "Procurement and allocation of benefits and costs" would create when they are implemented by the IOUs.

Next, the Joint Parties suggest that forcing ESPs, CCAs and their customers to simply accept IOU procurement on their behalf will ease the administrative burden imposed upon Commission staff which was created as a result of the PSA, in the first place. The concern for Staff seems seriously disingenuous when one considers the administrative burden that the Joint Parties have created by refusing to allow affected parties to participate in the development of the settlement, thus ensuring the strong protests that have resulted, which have led to extensive additional meetings, *ex parte* discussions, and the like. Moreover, as noted above, Direct Access and CCA has been formed for the express purpose of providing customers with procurement choices, and the Commission cannot undo that right in order to reduce its administrative tasks.

Finally, the Joint Parties suggest most egregiously that they should be made responsible for all CHP procurement so that "to the extent ESPs and CCAs lose a significant number of customers,

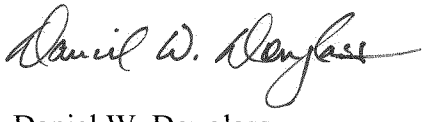
they will not be locked into long-term CHP contracts that may provide more energy than needed by their customers."[6] ESPs and CCAs manage load migration risk each and every day; indeed it is a significant element of the value that ESPs and CCAs bring to their customers. Risk management is one of the strongest and valued competencies that ESP's and CCA's utilize in managing their whole supply portfolio. Allowing the IOUs to insulate ESPs and CCAs from load migration is nothing more than a thinly veiled attempt to reduce the value of retail choice services, because the IOU's are aware that the ESP's and CCA's excellent performance in this area cannot be questioned.

In summary, the Joint Parties are not satisfied with their own PSA and are seeking modifications to it. The CCA/Direct Access Parties are glad that the Joint Parties are finally recognizing that their PSA is flawed, and in need of modification. Whether or which of the Joint Parties' or the CCA/Direct Access Parties' proposed modifications adequately balance the interests of all affected parties should be explored by the Commission in a comprehensive manner that ensures that all affected parties get to represent their own interests.

## III. CONCLUSION

The fact that the Joint Parties Comments seek to modify the PSA is further evidence of just how ill-conceived and unfair the PSA actually is. While the Commission may be eager to put QF litigation behind, that cannot serve as reason enough to endorse the elements of the PD that affect the financial viability and survival of ESP and CCA interests, especially now that the Joint Parties themselves have recognized that the PSA is in need of modification. The Commission can and should eliminate and modify the elements of the PD that impact ESPs, CCA, and their customers and may even decide to send them back to the drawing board to allow all interested parties to fully participate in the development of a CHP program that addresses the interests of all affected parties.

Respectfully submitted,



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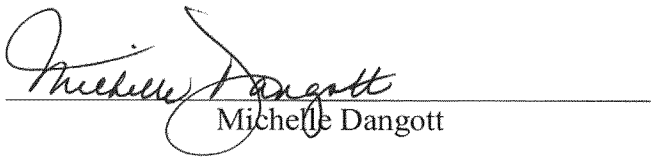
[6] See Joint Parties comments, page 4.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the ***Joint Reply Comments of the Marin Energy Authority, the Alliance for Retail Energy Markets and the Direct Access Customer Coalition on The ALJ Wetzel Decision Adopting Proposed Settlement*** on all parties of record in ***A.08-11-001, R.06-02-013, R.04-04-003, R.04-04-025 and R.99-11-022***, 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 December 13, 2010, at Woodland Hills, California.



Michelle Dangott

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