

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Order Instituting Investigation on the Commission's  
Own Motion to actively promote the development  
of transmission infrastructure to provide access to  
renewable energy resources for California

Investigation 08-03-010  
(Filed March 13, 2008)

Order Instituting Rulemaking on the Commission's  
Own Motion to actively promote the development  
of transmission infrastructure to provide access to  
renewable energy resources for California

Rulemaking 08-03-009  
(Filed March 13, 2008)

**COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES  
ON ASSEMBLY BILL 1954**

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ON ASSEMBLY BILL 1954**

Pursuant to the Ruling of Administrative Law Judge Anne Simon issued on November 9, 2010, the Division of Ratepayer Advocates ("DRA") respectfully submits these comments on Assembly Bill (AB) 1954. The Ruling requests comments on issues raised by the amendments to two subsections of the Public Utilities Code § 399.2.5 made by AB 1954. To the extent it has specific comments on the issues, DRA addresses each of the issues in turn below and also submits additional comments on implementation of the relief granted in § 399.2.5(c).

The Commission should require that a utility requesting relief under § 399.2.5(c) must make a showing based on an updated version of the three-prong test adopted in Decision ("D.") 07-03-012 that integrates DRA's recommended modifications as discussed below. Further, costs eligible under §399.2.5(c) should be limited to direct project-specific pre-construction costs, e.g., feasibility studies and project engineering - not actual construction costs. Finally, the Commission should adopt DRA's proposed framework for the tracking and recovery of costs eligible under §399.2.5(c).

## I. DISCUSSION

The Ruling identifies four issues regarding AB 1954 for comment.

**A. What Format Should The Commission Prescribe For A Utility's Certification In Its Advice Letter "That It Expects That The Facility Will Be Necessary To Facilitate Achievement Of The Renewables Portfolio Standard...?"**

DRA discusses in section B below its recommendations as to the required showing regarding the necessity of the transmission project for a utility's achievement of its renewables portfolio standard (RPS). Provided that the utility has included a thorough showing supporting its expectation that the facility will be necessary to facilitate achievement of the RPS, an attestation at the end of the advice letter by an officer at the Vice-President level or higher should be sufficient for the utility's certification.

**B. What Showing Should The Commission Require A Utility To Make To Support The Utility's "Expect[Ation] That The Facility Will Be Necessary To Facilitate Achievement Of The Renewables Portfolio Standard. . .?"**

In D.07-03-012, the Commission adopted a three-prong test for the determination of need when considering transmission CPCN applications where the facility may be necessary for the utility to meet its RPS mandate. The current three-prong test is a good starting point for the required showing under § 399.2.5(c), but DRA recommends changes to the test's existing language that would significantly improve the usefulness of a utility's showing that a project will be necessary to facilitate achievement of the RPS by taking into account recent developments and providing a clearer standard of review.

With DRA's recommended changes, the three-prong test should provide an effective tool for evaluating a utility's showing regarding eligible costs incurred prior to permitting or certification pursuant to § 399.2.5(c).

DRA's proposed changes to the three-prong test are discussed below:

### **1. First Prong**

That the project would bring to the grid renewable generation that would ~~remain~~ otherwise ~~unavailable~~ be undeliverable;

The primary recommendation is a change from “unavailable” to “undeliverable”. Typically, “unavailable” refers to generation that is either on planned (maintenance) or unplanned (forced) outage. An “unavailable” resource can also be a unit on cold (long-term) standby. An “undeliverable” resource typically refers to a resource that is available, but due to transmission constraints (short-term or long-term), cannot be delivered to the grid. Therefore, “undeliverable” is the more appropriate term.

### **2. Second Prong**

That the area within the line’s reach ~~would play a critical role in meeting RPS goals~~ is in a competitive renewable energy zone (CREZ) or area that has been RETI, or similarly stakeholder vetted.

Considerable progress has been made on the vetting of environmental issues in relation to the identification and assessment of potential renewable resource areas within California. Most significantly, the RETI has identified 29 competitive renewable energy zones (CREZ) in the state. The Commission should fully utilize the information produced by RETI, and ensure that transmission projects intended to facilitate RPS compliance are located in the CREZs identified by RETI or similar stakeholder processes.

### **3. Third Prong**

That the cost of the line is appropriately balanced against ~~the certainty of the line’s contribution to economically rational RPS compliance,~~ absent construction of the line.

“Certainty” is a difficult regulatory measure to accurately define. In this context, the Commission likely meant the probability of a transmission line being a used and useful asset while delivering a significant amount of renewable energy

to the CAISO grid. While a good policy goal, it is difficult to assign a meaningful probability to the usefulness of a planned transmission asset that is expected to deliver power from yet to be constructed generation plants that may or may not have: (1) a place in the CAISO Interconnection Queue, (2) an approved RPS contract, (3) a significant level of Permitting Effort or (4) project financing. Any probability assessment would be made during the Certificate for Public Convenience and Necessity (CPCN) proceeding, which by definition means the transmission project is still in the planning stages. In order to improve the analytical basis for prong three, the cost of the line should be compared to the alternative cost of RPS compliance under the scenario where the line is not constructed.

**C. What Types Of "Costs Incurred Prior To Permitting Or Certification" Should Be Eligible For Approval Of Cost Recovery Pursuant To § 399.2.5(C)(2)? What Types Of Pre-Permitting Or Pre-Certification Costs Should Not Be Eligible? Please Be Specific About The Types Of Costs And The Justification For Concluding That Each Type Should Or Should Not Be Eligible For Cost Recovery Pursuant To § 399.2.5(C)(2).**

Costs eligible for cost recovery pursuant to § 399.2.5(c)(2) should be limited to direct, project-specific costs for items such as feasibility studies, legal and consulting services, and project engineering that are incurred prior to permitting or certification. No construction costs, whether capital or expense, should be eligible for recovery pursuant to § 399.2.5(c)(2), as these costs should be included in the cost estimate contained in the utility's application for a CPCN or Permit to Construct (PTC) for the project.

Once a utility files an application for a CPCN or PTC, the period defined as "prior to permitting or certification" should be closed. Any costs incurred after an application is filed should be covered by the cost estimate for the project in the

application or by the regulatory expenses approved in the utility's general rate case.

**D. Notwithstanding The Prudency Review Required By § 399.2.5(C)(2), Should The Commission Place Limits On The Amount Of "Costs Incurred Prior To Permitting Or Certification" That Could Be Approved When Presented By Advice Letter As Authorized By § 399.2.5(C)(2)? If The Commission Should Impose Limits On Approval Of Pre-Permitting Or Pre-Certification Costs, Please Propose A Method For Determining What The Limits Should Be.**

As discussed above, DRA supports restrictions on the "type" of costs eligible under § 399.2.5(c)(2). However, any pre-set "limit" on the costs incurred prior to permitting or certification that could be approved when presented by advice letter as authorized by § 399.2.5(c)(2) would be arbitrary due to the unique nature of each transmission project. It would be difficult to determine what a standardized limit on the costs should be since each transmission project will have different circumstances that affect the costs incurred prior to permitting or certification. When a utility files an advice letter to recover the costs, interested parties will have the opportunity to protest the level of costs requested in the advice letter prior to its approval by the Commission.

Any Commission approval should: (1) clarify that approval of the advice letter for eligible costs incurred prior to permitting or certification is based on a showing that the transmission facility is necessary to achieve the RPS and (2) stipulate that the ultimate recovery of the costs will be fully reviewable and contingent on a prudency and reasonableness review.

**E. Additional Implementation Issues**

Although the Ruling does not identify what ratemaking mechanisms should be used to implement § 399.2.5(c)(2) as a specific issue for comment, DRA submits the following comments since they are relevant under the general category

of “issues raised by the amendments to two subsections of § 399.2.5 made by AB 1954”.<sup>1</sup>

DRA recommends that the Commission adopt a framework that requires a utility requesting relief pursuant to § 399.2.5(c)(2) to file a Tier 2 advice letter for approval of the establishment of a memorandum account to track “costs incurred prior to permitting or certification”. The Tier 2 advice letter process provides interested parties an opportunity to protest the utility’s showing as to its expectation “that the facility will be necessary to facilitate achievement of the RPS”.

When the utility ultimately seeks to recover the eligible costs tracked in the memorandum account, the Commission should require the filing of a Tier 3 advice letter. The Tier 3 advice letter process will provide enhanced scrutiny regarding the reasonableness and prudence of the incurred costs. Furthermore, the enhanced scrutiny of the Tier 3 advice letter process is appropriate since the costs incurred prior to permitting or certification could be substantial and should not be approved without a Commission Resolution.

## **II. CONCLUSION**

DRA respectfully submits these comments on the issues identified by the Ruling related to the Commission’s efforts to actively promote the development of transmission infrastructure to provide access to renewable energy resources for California.

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<sup>1</sup> ALJ’s Ruling requesting comments on AB 1954, p. 1.

Respectfully submitted,

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December 6, 2010



**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of **COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES ON ASSEMBLY BILL 1954** to the official service list in **I.08-03-010 and R.08-03-009** by using the following service:

**E-Mail Service:** sending the entire document as an attachment to all known parties of record who provided electronic mail addresses.

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Executed on **December 6, 2010** at San Francisco, California.

/s/ ALBERT HILL

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