BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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 (Filed November 4, 2008)
And Related Matters.	R.06-02-013 R.04-04-003 R.04-04-025 R.99-11-022

RESPONSE OF THE MARIN ENERGY AUTHORITY, THE ALLIANCE FOR RETAIL ENERGY MARKETS, SHELL ENERGY NORTH AMERICA (US), L.P., AND THE DIRECT ACCESS CUSTOMER COALITION TO THE JOINT PETITION FOR MODIFICATION OF DECISION 10-12-035

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SHELL ENERGY NORTH AMERICA (US), L.P.

April 18, 2011

BEFORE THE PUBLIC UTILITIES COMMISSION
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In accordance with Rule 16.4(f) of the Commission's Rules of Practice, the Marin Energy Authority ("MEA")[1], the Alliance for Retail Energy Markets ("AReM")[2], Shell Energy North America (US) L.P. and the Direct Access Customer Coalition ("DACC")[3] (hereinafter collectively referred to as the CCA/Direct Access Parties) respectfully submit this response to the Joint Parties'[4] Petition for Modification ("Petition") of Decision ("D.") 10-12-035 (December 16, 2010). The

[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] The Joint Parties are the California Municipal Utilities Association ("CMUA") and the parties to the "Qualifying Facility and Combined Heat and Power ("CHP") Program Settlement Agreement" ("Settlement Agreement"), namely Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, the California Cogeneration Council, the Independent Energy Producers Association, the Cogeneration Association of California, the Energy Producers and Users Coalition, the Division of Ratepayer Advocates, and The Utility Reform Network.

Petition, if approved, would exempt certain categories of municipal departing load ("MDL") customers from nonbypassable charges that otherwise would apply to all MDL customers under the QF/CHP settlement agreement that was approved in D.10-12-035. Further, it would allow other categories of MDL customers to pay stranded costs associated with the CHP program on a "vintaged" basis, rather than through a uniform cost allocation mechanism ("CAM") approach, as would have been the case under D.10-12-035.

As explained more fully below, the CCA/Direct Access Parties submit this response for two reasons: First, the Commission must ensure against cost-shifting as a result of the Petition. The customers of CCAs and ESPs should not be required to pay for any of the nonbypassable costs associated with the QF/CHP Program that would have been paid by MDL customers but for the changes to the settlement proposed in the Petition.

Second, the Commission must consider whether a similar "vintaged" approach for stranded costs should be adopted for the customers of CCAs and ESPs so that the QF/CHP program would have a substantially similar impact on all customers served by non-utility load serving entities.

I. BACKGROUND

On October 8, 2010, the Settling Parties[5] filed a Proposed Settlement Agreement ("PSA") for Commission approval. The development of the PSA, over a sixteen month period, was carried out without the participation of electricity service providers ("ESPs") or Community Choice Aggregators ("CCAs") even though the provisions of the PSA would clearly have significant impacts on their business and on the manner in which they will work with their customers to

[5] The Settling Parties are California's three largest investor-owned utilities ("IOUs"), namely 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, namely the California Cogeneration Council, the Independent Energy Producers Association, the Cogeneration Association of California, and the Energy Producers and Users Coalition; and the Division of Ratepayer Advocates ("DRA") and The Utility Reform Network ("TURN") (collectively, the "Joint Parties")

contribute to greenhouse gas ("GHG") emission reductions. On December 16, 2010 the Commission issued D.10-12-035 which modified the PSA and adopted it with the modifications. On January 20, 2011, CMUA submitted a request for rehearing, and then on March 16, 2011, submitted a motion to hold the rehearing request in abeyance, as follows:

> Abeyance of the CMUA Application for Rehearing is necessary to allow CMUA and the Settling Parties time to finalize agreed upon changes and make an appropriate filing with the Commission proposing modifications to the Settlement Agreement and D.10-12-035.[6]

On April 1, 2011, the Joint Parties submitted their Petition, along with a Joint Motion to Shorten Time. Administrative Law Judge Yip-Kikugawa granted the Joint Motion to Shorten Time via e-mail on April 3, 2011, and set April 18, 2011 as the due date for responses to the Petition. Therefore this response to the Petition is timely submitted.

II. RESPONSE TO THE PETITION

A. Adoption of the Petition Should Not Result in a Shifting of Stranded Costs to CCA/DA Customers

The CCA/Direct Access Parties do not object to the Petition, with one caveat. The agreed upon stranded cost approach creates the potential for cost shifting to the CCA/Direct Access Parties. The Commission must ensure that by exempting certain MDL customers from nonbypassable charges associated with the settlement, the IOUs do not shift costs to the customers of ESPs and CCAs.

Under the settlement agreement as adopted in D.10-12-035, MDL customers would be obligated to pay the nonbypassable charges created by the CHP Program on the same basis as CCA and DA customers. If adopted, the Petition would exempt certain MDL customers from those nonbypassable charges. Moreover, other categories of MDL customers would pay stranded costs on

[6] See *Motion of CMUA for Abeyance and To Shorten Time*, page 3.

a "vintaged" basis rather than having the IOUs procure CHP resources on behalf of those customers, as is required under D.10-12-035. While the Petition clearly modifies (and reduces) payments to be made by MDL customers, the Petition fails to explain how the stranded costs that otherwise would have been recovered from MDL customers will be recovered when and if the Petition is approved.

CCAs, ESPs, and their customers, who were not parties to the original settlement and were not involved in development of the Petition, should be no worse off with respect to the nonbypassable payments they must make as a result of this Petition. Any difference between what MDL customers would have paid pursuant to D.10-12-035 and what MDL customers will pay as a result of this Petition must accrue solely to the Settling Parties, and should not be allocated under any circumstances to CCAs, ESPs, or their customers. The Settling Parties, which appear eager to make concessions to satisfy the concerns of CMUA (so that CMUA withdraws its objections to D.10-12-035), must be the entities that pay for these concessions. CCAs, ESPs, and their customers, who receive no benefit from the accommodations provided by the Settling Parties, should not have to pay additional costs as a result of the Petition.[7]

The IOUs should be required to track the difference between the nonbypassable costs that would have accrued to MDL customers under D.10-12-035, and the nonbypassable costs that MDL customers will actually pay as a result of the approval of the Petition. The CCA/Direct Access parties take no position on how these costs are allocated among the Settling Parties, but these costs should not be allocated to the customers of CCAs and ESPs.

Because the CCA/Direct Access Parties do not know how the Commission will choose to allocate these costs, specific Findings of Fact, Conclusions of Law, and Ordering Paragraph are not

[7] Likewise, if the calculation of the non-bypassable charges associated with the CHP Program, as modified by D.10-12-035, should ever be negative, and is, as proposed in the Petition, tracked in a memorandum account to offset future above market costs of the CHP Program, the portion of that benefit that would have accrued to MDL should accrue solely to the Settling Parties.

presented here. The CCA/Direct Access Parties reserve further comment on the Petition until such time as the Commission addresses how the stranded costs that would have been paid by MDL customers are allocated.

B. A "Vintaged" Approach for Allocation of the Nonbypassable Charges Associated with the CHP/QF Settlement Should be Considered for DA/CCA Customers As Well

The Petition proposes that for MDL customers, the Commission adopt a "vintaged" approach for allocation of nonbypassable charges associated with the CHP/QF Settlement Agreement. The Petition provides that "transferred" MDL customers who have departed IOU service as of the Settlement Effective Date will not be responsible for any nonbypassable charges associated with the Settlement Agreement. See Petition at p. 5. Transferred MDL customers who depart IOU service after the Settlement Effective Date will be responsible for a nonbypassable charge for the PPAs entered into to meet the 3000 MW target under the Settlement Agreement, but on a vintaged basis. These transferred MDL customers will not be responsible for any CHP Program costs associated with the Second Program Period and the IOUs' greenhouse gas emissions reduction targets. See Petition at pp. 5-6.

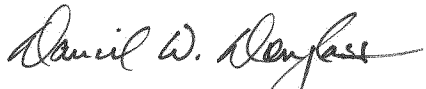
As noted above, the CCA/Direct Access Parties do not object to this "vintaged" approach for MDL customers, subject to an assurance that this approach will not result in cost-shifting to CCA/DA customers. In fact, the CCA/Direct Access Parties submit that the same (or similar) vintaged approach should be adopted for CCA and ESP customers, as well. The Petition fails to address why MDL customers should be afforded vintaged treatment when CCA/DA customers are not. The CCA/Direct Access Parties submit that a vintaged approach is appropriate for CCA/DA customers because these customers, like MDL customers, should be subject only to costs that are incurred on their behalf.

The CCA/Direct Access Parties are prepared to meet with the Joint Parties and Commission staff to attempt to reach a resolution that will ensure that customers of CCAs and ESPs are treated the same as MDL customers with respect to the nonbypassable costs associated with the CHP/QF settlement. The CCA/Direct Access Parties believe that the proposals in the Petition provide a basis for a comprehensive agreement that resolves the nonbypassable charge issue for all customers served by non-utility load-serving entities.

III. CONCLUSION

The CCA/Direct Access Parties do not object to the Petition, subject to the assurance that any additional stranded costs resulting from the proposed approach for MDL customers will not be allocated to ESP and CCA customers. In addition, the CCA/Direct Access Parties note that the vintaged approach set forth in the Petition can be applied to CCA and DA customers as well. The Commission should encourage the Joint Parties to work with CCAs, ESPs and their customers to reach a comprehensive resolution that includes a vintaged approach for all customers served by non-utility load-serving entities.

Respectfully submitted,



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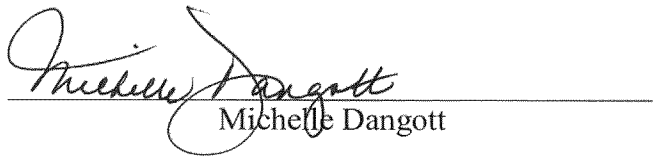
April 18, 2011

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the ***Response of the Marin Energy Authority, the Alliance for Retail Energy Markets, Shell Energy North America (US), L.P. and the Direct Access Customer to the Joint Petition for Modification of Decision 10-12-035*** 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 April 18, 2011, at Woodland Hills, California.



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