

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

Order Instituting Rulemaking to Continue  
Implementation and Administration of California  
Renewables Portfolio Standard Program

**R. 11-05-005**  
(Filed May 5, 2011)

**REPLY COMMENTS OF SIERRA CLUB CALIFORNIA  
ON THE ORDER INSTITUTING RULEMAKING  
REGARDING IMPLEMENTATION AND ADMINISTRATION  
OF THE RENEWABLES PORTFOLIO STANDARD PROGRAM**

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## **I. INTRODUCTION**

In accordance with the schedule provided in the Order Instituting Rulemaking (OIR), Sierra Club California respectfully submits the following comments in reply to the comments filed by other Parties on May 31, 2011. These reply comments clarify the issues that Sierra Club California believes should be priority issues in this rulemaking.

## **II. PRIORITY ISSUES IN THIS RULEMAKING**

### **a. IMPLEMENTATION OF PUBLIC UTILITIES CODE § 399.20, AS AMENDED, WILL ENCOURAGE RAPID INTEGRATION OF RENEWABLE ENERGY RESOURCES**

Sierra Club California believes that resolving issues that help to promote certainty and early procurement should be expedited in this proceeding. Sierra Club California urges, along with the Agricultural Energy Consumers Association, Center for Energy Efficiency and Renewable Technologies, Clean Coalition, California Wastewater Climate Change Group, California Solar Energy Industries Association, Solar Alliance, Sustainable Conservation, and the Union of Concerned Scientists for the Commission to treat implementation of SB 32 and Public Utilities Code § 399.20, as amended, as a top priority. Implementation of this program for standard offer contracts for small-scale renewable energy projects will increase deployment of renewable energy on an accelerated timeline, and with greater certainty of project delivery.

This is a key policy tool to developing 12,000 MW of distributed generation by 2020, and Sierra Club California urges a Tier 1 priority level for implementation of the feed-in tariff program.

Setting the market price ceiling is a necessary first step due to the amendment of § 399.20, by SB X1 2, replacing the market price referent with “market price,” as defined. Sierra Club California recommended in its opening comments to set and further define market price as “avoided cost,” as defined by FERC. The next essential step to a successful standard offer contract program is to establish cost-based prices differentiated by technology and project size. Sierra Club California believes that consideration of locational value and resource adequacy value as part of avoided cost is likely to support development of small-scale renewable energy projects, but that the Commission should set reasonable cost-based prices as has been done in feed-in tariff programs in other states and countries. For scheduling purposes, the Commission may need to defer some differentiated technologies from the Tier 1 priority level, but Sierra Club California urges the Commission to set and define market price, and set standard prices for the most commonly anticipated types of projects as a top priority.

#### **b. IMPLEMENTATION OF RPS COMPLIANCE AND ENFORCEMENT REQUIREMENTS**

Sierra Club California considers it a high priority to ensure a sustainable and enforceable RPS program. Therefore, Sierra Club California concurs with the Union of Concerned Scientists that the clarification of the compliance obligation for a regulated load-serving entity is a priority issue. Additionally, Sierra Club California concurs that it is important to clarify issues that would define what types and amounts of transactions will be considered eligible for compliance

with the RPS program to assist utilities with certainty in procurement. Finally, revisions to key enforcement provisions such as strengthening penalty rates and caps should be considered to ensure that they deter and mitigate noncompliance.

### **c. RENEWABLE ENERGY CREDIT TRADING RULES**

Sierra Club California agrees with the Union of Concerned Scientists that rulemaking that helps to promote certainty and early procurement should be expedited in this proceeding. Therefore, Sierra Club California concurs that setting rules for Renewable Energy Credit trading could promote early deployment of renewable energy and certainty in the RPS program. As stated in our opening comments, Sierra Club California urges for the Commission to consider preference for renewable energy projects and products that provide maximum environmental benefits,<sup>1</sup> particularly for impacted communities,<sup>2</sup> electricity products that represent greater reduction in greenhouse gas emissions,<sup>3</sup> and electricity products that represent cost-effective alternatives to new transmission rights-of-way.<sup>4</sup>

## **III. SELECTED ISSUES PROPOSED FOR TIER 1**

The listing of selected issues below is in response to the “Joint Parties’ Recommendations on Scoping and Prioritization of Issues in R.11-05-005.” Text in **bold** reflects a distinct recommendation of Sierra Club California to increase the priority level of a particular

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<sup>1</sup> Public Resources Code Section 25740.5(c).

<sup>2</sup> Public Utilities Code § 399.13(a)(7).

<sup>3</sup> Public Utilities Code Section 399.11(b)(4).

<sup>4</sup> Public Utilities Code Section 1005.1.

issue, and text in *italics* introduces a new sub-issue identified by Sierra Club California with a priority level comparable to the priority level assigned by the majority of Parties in the Joint Parties' Recommendation.

#### Issue 1: Modify Program to Implement Recent Legislation

1. Modify Renewables Portfolio Standard (RPS) compliance rules
  - a. Adopt new RPS compliance targets by January 1, 2012.
  - b. Modify flexible compliance rules, including implementing different banking rules for different types of RPS contracts
  - c. Resolve seams issues between the 20% RPS and 33% RPS compliance requirements, including implementing the provision that any retail seller procuring RPS eligible energy for at least 14% of retail sales in 2010 shall not have its RPS procurement deficits, if any, added to future procurement requirements.
2. Modify renewable energy credit (REC) trading rules
  - a. Modify the definition of renewable energy credits to eliminate delivery requirement and other changes.
  - b. Modify REC trading rules to provide that, in order to count for RPS compliance, RECs must be retired in the tracking system within 36 months from the initial date of generation of the associate electricity.
  - c. Define new terms e.g. “firmed and shaped”, “incremental energy” and “unbundled” RECs.
  - d. Implement usage limitations on REC transactions.

- i. Consider greenhouse gas emissions reduction when setting limits on categories of RPS-eligible procurement.*
- e. Develop rules for REC contracts executed prior to June 1, 2010, including determining what it means for a contract to “count in full” toward RPS procurement requirements.
- f. Determine how trading rules should include preference to renewable energy projects that provide environmental benefits to communities that suffer from high emission levels of toxic air contaminants, criteria air pollutants, and greenhouse gases. Public Utilities Code § 399.13(a)(7).*
- g. Integrate into trading rules the principles of Public Utilities Code Section 1005.1 regarding cost-effective alternatives to transmission.*

Issue 3: Compliance, Reporting And Enforcement

- 1 . Monitor and enforce compliance of retail sellers with RPS requirements, including but not limited to:
  - c . Clarify compliance requirements for years 2010-2013.

Issue 4: Least-Cost Best-Fit

- 1 . Review and improve bid evaluation methodology, including adjustments, as necessary for:
  - c. Resource adequacy value**
  - d. Locational benefits for distributed generation***

*e. Evolving significance of “Best-Fit” as renewables increase to 33% of total energy resources.*

**Issue 5: Implement section 399.20, as amended**

**1 . Develop requirements for standard tariffs of utilities for RPS-eligible generators of up to three megawatts capacity, including but not limited to:**

- a. Supplement briefs already submitted in R.08-08-009 to cover new statutory requirements.**
- b. Establish methodology to determine market price for standard tariffs.**
  - i. Determine locational benefits value.*
  - ii. Evaluate differentiated cost-based pricing for specific renewable technologies.*
- c. Address interconnection issues, including interconnection cost and the set up process for expedited interconnection procedures.**

**IV. SELECTED ISSUES PROPOSED FOR TIER 2.**

**Issue 1: Modify Program to Implement Recent Legislation**

**3. Modify RPS procurement plans**

*g. Determine how Commission direction to file procurement plans should include preference to renewable energy projects that provide environmental benefits to communities that suffer from high emission levels of toxic air contaminants, criteria air pollutants, and greenhouse gases. Public Utilities Code § 399.13(a)(7).*

5. Modify RPS enforcement rules

- a. Establish the process and rules for implementing new RPS enforcement regime.**

**V. SELECTED ISSUES PROPOSED FOR TIER 3**

Issue 4: Least-Cost Best-Fit

- 1 . Review and improve bid evaluation methodology, including adjustments, as necessary for:

*g. Determine how bid methodology should include preference to renewable energy projects that provide environmental benefits to communities that suffer from high emission levels of toxic air contaminants, criteria air pollutants, and greenhouse gases. Public Utilities Code § 399.13(a)(7).*

*h. Integrate into bid methodology the principles of Public Utilities Code Section 1005.1 regarding cost-effective alternatives to transmission.*

**VI. REPLY TO PROPOSED CHANGES TO ISSUE DESCRIPTIONS**

Sierra Club California agrees with the scope of issues identified by the preliminary scoping order and Attachment A to the OIR, with the addition of selected issues raised in the points above. Pacific Gas and Electric (PG&E) raised objections to several descriptions, seeking to significantly narrow the scope of this rulemaking before the Commission may even consider these important issues. Although some changes may be appropriate for revision, the chart below



provides a response to aspects of the proposed changes that would prematurely narrow the scope of this proceeding:

<b>Issue as Identified in OIR</b>	<b>PG&amp;E Recommended Revision of Title</b>	<b>Reason for Retaining CPUC Language in Title, if any</b>
<p>“Implement usage limitations on REC transactions (§ 399.16(c))” (OIR, Attach. A, pg. 2, 2<sup>nd</sup> bullet).</p>	<p>Implement accounting rules for product content requirements (§ 399.16(c))</p>	<p>The phrase “usage limitations” appropriately describe the intent of § 399.16(c) to limit the usage of each type of electricity product. The phrase “accounting rules” reflects a ministerial process that would preclude furthering policy goals of implementing usage limitations.</p>
<p>“Establish the process and rules for implementing new RPS enforcement regime. (§ 399.15(b)(5).) (OIR, Attach. A, pg. 3, Point 5, 1<sup>st</sup> bullet).</p>	<p>Adopt standard process for seeking, granting, and implementing an RPS enforcement waiver. (§ 399.15(b)(5).)</p>	<p>The existing language is preferred due to the broad applicability to enforcement policy. The proposed wording would exclude discussion of penalties and other aspects of enforcement and compliance besides the waiver. A separate item in the scope regarding the waiver process would not be objectionable, although terms and applicability of the waiver process proposed by PG&amp;E are overbroad and would discourage compliance.</p>
<p>Use of the phrase: “Tradable renewable energy credits (TREC’s)” (OIR at 9, Issue 4, 2<sup>nd</sup> bullet; OIR at 10, Issue 6.3).</p>	<p>Substitute the phrase: “Firming and Shaping Products and Unbundled REC Products”</p>	<p>No objection at this time as long as the scope is not unduly narrowed.</p>
<p>Adopt rules for evaluating, and possibly auditing, the portfolio content category of all RPS transactions (399.16(b)) (OIR, Attach. A, pg.1, 3<sup>rd</sup> bullet).</p>	<p>Substitute the phrase: “Implement auditing rules.”</p>	<p>Provided that evaluation of RPS transactions is sufficiently included elsewhere in the scope, no objection to indicating that this issue refers to auditing.</p>

## **VII. REPLY TO COMMENTS ADDRESSING PROPOSED SCHEDULE**

Sierra Club California generally endorses the schedule for priorities proposed by the Center for Energy Efficiency and Renewable Technologies (CEERT), which proposes expedited Decision schedules for SB 32 (Expanded FIT) Implementation, Definition of RPS-Eligible Products, RPS-Obligated Entities' Compliance, and Project Viability/Resource Adequacy.

Pacific Gas and Electric (PG&E), San Diego Gas and Electric (SDG&E) and Southern California Edison (SCE) each proposed schedules for Tier 1 issues. Sierra Club California generally finds the suggested timeframes adequate, but urges more iterative opportunities, so that Parties may respond meaningfully to proposals. Specifically, Sierra Club California suggests that the SDG&E schedule be modified to include an optional response to proposals prior to the issuance of a Proposed Decision. In addition, the schedule should plan for a follow-up workshop on open issues following responses to comments. Particularly for an expedited timeframe, this follow-up workshop could help resolve issues without evidentiary hearings. Further, the schedule should allow for comments on the Proposed Decision so that technical modifications may be incorporated in the Commission Decision. Sierra Club California believes that these optional responses could be incorporated in a schedule targeting a Commission Decision by October 6, 2011, as intended by the schedule proposed by SDG&E.

Likewise, Sierra Club California urges with regard to the Tier 2 schedule recommended by SCE sufficient iterative opportunities to respond to proposals, and for open issues to be addressed in follow-up workshops if necessary. Specifically, the schedule could include a workshop in March or April 2012 on the staff proposal prior to comments on the staff proposal.

The level of opportunity needed for comment and dialogue may vary depending on the contentiousness of the specific issues within each Tier. Sierra Club California notes that additional parties suggest the opportunity to file reply/response comments.

## VIII. CONCLUSION

Sierra Club California urges the Commission to prioritize implementation of SB 32 to expedite increased deployment of renewable energy on an accelerated timeline and include setting of prices for a feed-in tariff as a Tier 1 issue. Sierra Club California considers compliance and enforcement, and renewable energy credit rules to be priority issues to help provide regulatory certainty and encourage early deployment and successful compliance.

When renewable energy credit rules and bid evaluation methodology are considered, Sierra Club California urges for the Commission to consider preference for renewable energy projects and products that provide maximum environmental benefits, particularly for impacted communities, electricity products that represent greater reduction in greenhouse gas emissions, and electricity products that represent cost-effective alternatives to new transmission rights-of-way.

Dated: June 9, 2011

/s/ Jim Metropulos

Jim Metropulos, Senior Advocate

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/s/ Andy Katz

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## VERIFICATION

I am the Senior Advocate with Sierra Club California and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in this pleading are true.

I declare under penalty of perjury that the matters stated in this pleading are true and correct.

Executed on the **9th day of June, 2011**, at Sacramento, California.

/s/ Jim Metropulos

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**CERTIFICATE OF SERVICE**

I hereby certify that I have duly served a copy of “Reply Comments of Sierra Club California on the Order Instituting Rulemaking Regarding the Implementation and Administration of the Renewables Portfolio Standard Program” in compliance with the Commission’s Rules of Practice, this 9th day of June, 2011. Parties on the Service List have been served by e-mail, if an e-mail address has been provided, or by first class mail, if none provided. The assigned Commissioner and Administrative Law Judge have been served by first class mail.

A copy of the service list is attached.

Signed this 9th day of June, 2011 in Sacramento, CA

/s/ Jim Metropulos

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