

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

Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans.	Rulemaking 12-03-014
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**COMMUNITY ENVIRONMENTAL COUNCIL AND CLEAN COALITION
REPLY TO SCE'S MOTION TO STRIKE TESTIMONY**

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August 6, 2012

COMMUNITY ENVIRONMENTAL COUNCIL AND CLEAN COALITION REPLY TO SCE'S MOTION TO STRIKE TESTIMONY

The Community Environmental Council ("the Council") and Clean Coalition ("the Coalition") file this Reply to Motion to Strike Testimony ("the Reply") in response to the Motion to Strike filed by the Port of the the Reply ("SCE"). The Council and the Coalition ("the Parties") file this Motion to Strike ("the Motion"), pursuant to Rule 11.1(e).

WHEREAS,

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I. Discussion

WHEREAS,

a. Community Environmental Council's Motion to Strike

WHEREAS,

As the Council discussed in its opening testimony, the Commission should be responsive and relevant to this proceeding, and thus should not file numerous motions to strike in this proceeding, especially aggressive strategy to undermine the Council's testimony. Beyond the issues that SCE's motions to strike raise with respect to

¹ Council Reply Testimony, p. 12:

"A number of parties' opening testimony raised issues concerning California's official loading order, vis a vis LCR issues, and urged the Commission to respect the loading order. SCE is seeking authority to procure LCR through bilateral contracts and RFOs. We are proposing, in direct response¹ to SCE and other parties' opening testimony, an additional means of procuring LCR. As such, our proposal is fully within the scope of this proceeding. Moreover, the May 17 Scoping Memo states (p. 5) that the following issue is in scope for Track 1 of this proceeding:

How resources aside from conventional generation, such as uncommitted energy efficiency, demand response, energy storage and distributed generation resources should be considered in determining future local reliability needs

The Council does not oppose SCE's request for bilateral and RFO authority, but we do urge the Commission to consider the ability of a Solar/ES LCR FIT to meet, at least in part, projected LCR in the LA Basin. If the parties' and the Commission's responses to our proposal are positive, we will be happy to provide far more detail about wise design principles for the Solar/ES LCR FIT."

The 웹□nCouncil's 웹□ntestimony 웹□nis: 웹□n1) 웹□nClearly 웹□nwithin 웹□nthe 웹□nscope 웹□n
on 웹□nан 웹□nAdditional 웹□nprocurement 웹□nmechanism 웹□nfor 웹□npreferred 웹□nresources
Requirements 웹□n(LCR); 웹□n12) 웹□nClearly 웹□nwith 웹□nthe 웹□nopening 웹□nby 웹□n
1 웹□nabko 웹□nClearly 웹□nresponds 웹□nsto 웹□nNSCE's 웹□nopening 웹□nopening 웹□n
procurement 웹□nmechanism 웹□nthose 웹□nidentified 웹□nin 웹□nNSCE's 웹□nopening 웹□n
testimony 웹□n

The following is supposed to facilitate discussion of these issues. It is a

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SCE's petition for intervention in the same arguments with respect to the same testimony. The proposed Solar Project respects the public's right to participate in the decision-making process. In response to the critique couched in our Clean Coalition's complaint, we have provided a detailed description of the procurement process used by the utility to procure new generation resources. The utility has engaged in a competitive bidding process for new generation resources. The utility has issued a request for proposals for new generation resources. The utility has received bids from various sources, including renewable energy providers. The utility has evaluated the bids and selected the most cost-effective and reliable bids. The utility has entered into contracts with the selected providers to supply new generation resources. The utility has also taken steps to ensure that the new generation resources are produced in an environmentally friendly manner. The utility has committed to investing in clean energy projects and has set a target of 50% renewable energy by 2030. The utility has also taken steps to reduce its carbon footprint and has set a target of 80% greenhouse gas reduction by 2050. The utility has also taken steps to ensure that the new generation resources are produced in an environmentally friendly manner. The utility has committed to investing in clean energy projects and has set a target of 50% renewable energy by 2030. The utility has also taken steps to reduce its carbon footprint and has set a target of 80% greenhouse gas reduction by 2050.

testimony 웹□η was 웹□η identified by sources 웹□η available 웹□η to the Clean Coalition. 웹□η evidence 웹□η the 웹□η recently 웹□η DPP 웹□η procurement 웹□η plan 웹□η for 웹□η the 웹□η results 웹□η of 웹□η a 웹□η reputable 웹□η study 웹□η the 웹□η study 웹□η found 웹□η resources 웹□η meet 웹□η LCR 웹□η simply 웹□η cannot 웹□η do 웹□η see 웹□η the 웹□η found 웹□η proceeding. 웹□η Separately, 웹□η response SCE 웹□η to the 웹□η for 웹□η a 웹□η specific 웹□η procurement Clean 웹□η Coalition 웹□η also 웹□η the 웹□η mechanism 웹□η has 웹□η been thoroughly 웹□η reviewed 웹□η and 웹□η the 웹□η funds 웹□η the 웹□η reg. 웹□η is 웹□η thoroughly 웹□η investigated 웹□η seek 웹□η the 웹□η a 웹□η comprehensive 웹□η made 웹□η in 웹□η direct 웹□η was 웹□η the 웹□η a 웹□η from 웹□η fc procurement 웹□η mechanism 웹□η this 웹□η and 웹□η of 웹□η a 웹□η possible 웹□η solution 웹□η needs...”, 웹□η np. 웹□η 10). 웹□η

웹□η

The 웹□η Clean 웹□η Coalition 웹□η also 웹□η does 웹□η not 웹□η have 웹□η the 웹□η ability 웹□η to 웹□η win 웹□η this 웹□η position. 웹□η we 웹□η believe 웹□η robust 웹□η discussion 웹□η of 웹□η these 웹□η issues 웹□η is 웹□η a 웹□η net- 웹□η

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II. Conclusion 웹□η

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In 웹□η sum, 웹□η SCE's 웹□η motion 웹□η is 웹□η over 웹□η the 웹□η top 웹□η in 웹□η its 웹□η aggressive 웹□η striking 웹□η the 웹□η action. 웹□η Clean 웹□η Coalition is 웹□η We 웹□η urge 웹□η the 웹□η to deny 웹□η the 웹□η action. 웹□η filing 웹□η frivольный 웹□η information 웹□η before 웹□η the 웹□η CAC 웹□η not 웹□η object 웹□η to 웹□η allowing 웹□η SCE 웹□η to 웹□η

August 6, 2012

Respectfully submitted,

By: The Community Environmental Council



Tam Hunt, Attorney

By: The Clean Coalition

_____ /s/ _____

Sahm White, Policy Director