

**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 R-12-03-014

**REPLY COMMENTS OF THE GREEN POWER INSTITUTE  
ON THE PLANNING SCENARIOS FOR THE 2012 LTPPS**

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**Introduction**

Pursuant to the *Revised Assigned Commissioner's Ruling Setting Forth Standardized Planning Scenarios for Comment*, dated September 25, 2012, the Green Power Institute (GPI) respectfully submits this *Reply Comments of the Green Power Institute on the Planning Scenarios for the 2012 LTPPs*, in R.12-03-014, the **Order Instituting Rulemaking to Integrate and Refine Procurement Policies and Consider Long-Term Procurement Plans**.

Before getting into the details of the proposed 2012 LTPP study scenarios, we wish to endorse the remarks made by CEERT in their *Comments*, in which they express a concern that the entire process of formulating study scenarios is oriented to producing a finding that new gas-fired generation is needed during the planning horizon of the 2012 LTPPs. The GPI has long complained that the LTPP's approach of not including the role of technological development in the future design and operations of the grid of the future leads the analysis to consider only conventional fossil-fuel generators as a means to provide the grid services that a future grid with a high percentage of intermittent renewables will need, when in fact these services are at least as likely to come from new technologies, such as improved smart-grid controls and storage. We urge the Commission to take CEERT's recommendation to recast the base-case scenario as a best-with-what-you-have scenario seriously.

We agree with PG&E that the 2012 LTPPs should include some kind of robust-economic-growth scenario, although we do not believe that such a scenario has to be tied to the Replicate-TPP scenario, as discussed by PG&E in their *Comments*. As we discussed in our own *Comments*, the demand scenarios that are being used for the 2012 LTPPs are based on the latest projections of the IEPR, and these projections were produced in 2011

and early 2012, a period that came on the tail end of an extended and deep recession. As far as we can tell none of the current IEPR projections, including the high-demand-growth scenario, account for the possibility that the economy will recover vigorously from the recession, and achieve robust levels of economic activity. Should this desirable outcome be achieved, even assuming significant future success with efficiency and DSM efforts, it is highly likely the amount of RPS energy that would be needed will be considerably greater than anything that is covered by the planning scenarios included in the Attachment to the ACR. A high-growth economic scenario should be included in the set of study scenarios for the 2012 LTPPs.

Several parties, including TURN, NRDC, the CA Environmental Justice Alliance, and the Alliance for Nuclear Responsibility, suggest dropping, or at least de-prioritizing, the Replicate-TPP scenario, and we agree with these parties. This scenario is supposed to be supportive of the CAISO transmission planning process, but since they have already constructed their scenario the LTPP work will not add to the CAISO's analysis, and there is no compelling reason for the LTPP to try to replicate it.

We agree with NRDC and CEERT that the RPS stretch scenario should be more aggressive than the 40%-by-2030 target that is included in the Standardized Planning Scenarios. In our opinion this scenario should be moved to first priority, and should employ a 50%-by-2030 target. We strongly disagree with SCE's recommendation that this scenario be dropped altogether from the 2012 LTPP, because it is "premature." If we wait to study this scenario until it is already adopted as state policy, then we will find ourselves in the awkward position of having adopted it without the benefit of having studied it. That's backward public-policy making at its worst.

Finally, we agree with the Large-Scale Solar Association about the desirability of keeping the technology database on cost and performance of renewable generators up-to-date in whatever models that are being used in the performance of the 2012 LTPPs, specifically in this case in the RPS calculator. The database should be published, and Comments solicited from interested parties.

Dated October 19, 2012, at Berkeley, California.

Respectfully Submitted,



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