

From: Peacock, Tanya
Sent: 7/3/2013 3:37:28 PM
To: Allen, Meredith (/O=PG&E/OU=Corporate/cn=Recipients/cn=MEAe); Ng, Deana M (DNg@semprautilities.com); Allen, Cathie (Cathie.Allen@PacifiCorp.com); Grace.Vermeer@sce.com (Grace.Vermeer@sce.com); 'Houck, Jason' (jason.houck@cpuc.ca.gov); Ken Wittman (Ken.Wittman@libertyutilities.com)
Cc: Franz, Damon A. (damon.franz@cpuc.ca.gov); Hammond, Christine J. (christine.hammond@cpuc.ca.gov); Barker, David (DBarker@semprautilities.com); Peacock, Tanya (TPeacock@semprautilities.com)
Bcc:
Subject: RE: Release of IOU cost burden factors - EITE staff proposal

Jason,

SDG&E has no objection to the release of the IOU emissions factors. SDG&E does care how ED characterizes the data. The IOUs previously sent informal comments to Energy Division (attached) indicating that the line loss adjustment was inappropriate to include in the calculation since it makes the factor representative of emissions per unit of energy produced, not emissions per unit of energy consumed. Also characterizing it as "cost burden" is now incorrect since SONGs was assumed to be producing at full capacity in the 2009 S2 form.

Thanks for the opportunity to provide feedback!

Happy 4th of July!!

Tanya

Tanya Peacock

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From: Houck, Jason [mailto:jason.houck@cpuc.ca.gov]

Sent: Friday, June 28, 2013 3:20 PM

To: Grace.Vermeer@sce.com; Allen, Meredith; Peacock, Tanya; Ng, Deana M; Allen, Cathie; Ken Wittman

Cc: Franz, Damon A.; Hammond, Christine J.

Subject: Release of IOU cost burden factors - EITE staff proposal

Hi All,

Would any of you be opposed to Energy Division publishing IOU emissions factors in our forthcoming final staff proposal on EITE allocation formulas that would make it possible for the public to infer what portion of ARB's direct allocation of allowances was intended to address utility ratepayer cost burden? The ratepayer cost burden allocation is the portion of allowances that were intended to address portfolio emissions (i.e. the total allowance allocation less energy efficiency and early action RPS credits included on top of the cost burden allocation).

I'm referring to the calculations that we redacted in Table 2, Option C of the draft staff proposal (p. 43 of PDF). As you probably know, the utilities' allocation of allowances was based on ARB's analysis of the utilities' public S-2 forms filed with the CEC in 2009, which project your portfolio resource mix for each year. Because this data is both public and stale, at this point, I struggle to see how the release of ARB's cost burden factors would compromise your GHG market positions. Aside from this potential risk, which has questionable validity considering the changes all IOU portfolios have undergone since 2009, I'm unsure what other reason would justify withholding this data.

Energy Division would like to publish these emissions factors in its final staff proposal in the interest of allowing all parties to properly consider the various options we have proposed.

Would you be able to provide your feedback and concerns by Friday, 7/5?

Many thanks, and have a great weekend,

Jason