

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
(Filed March 22, 2012)

REPLY COMMENTS OF THE UTILITY REFORM NETWORK
ON THE PROPOSED DECISION OF ALJ GAMSON IN
TRACK 3 OF THE 2012 LTPP



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**REPLY COMMENTS OF THE UTILITY REFORM NETWORK
ON THE PROPOSED DECISION OF ALJ GAMSON IN
TRACK 3 OF THE 2012 LTPP**

Pursuant to Rule 14.3 of the Rules of Practice and Procedure, The Utility Reform Network (TURN) submits these reply comments on the Proposed Decision (PD) of ALJ Gamson in Track 3 of the 2012 Long Term Procurement Plan (“LTPP”) proceeding regarding the Investor-Owned Utilities’ (IOUs’) electric procurement.

TURN offers replies to some parties’ opening comments on the following aspects of the PD:

- The need for modifications to the PD to provide a more public process to develop the new quarterly compliance reporting template and to provide greater transparency of Investor-Owned Utility (IOU) procurement data.
- The need for clarification that upgrades to power plants that bid into IOUs’ Requests for Offers (RFOs) for new capacity may include projects that enhance operating characteristics without necessarily increasing capacity.

1. Providing Greater Transparency Regarding IOU Procurement (Sections 5.2.3 and 9.6)

In its opening comments, TURN recommended certain modifications to clarify the Commission’s intent to enhance the public disclosure of IOU forward procurement information.¹ TURN endorses the recommendations of other parties that the revision of the quarterly compliance reporting template be done through a public workshop process that includes all stakeholders, rather than just through the procurement

¹ TURN Opening Comments, pp. 2-3.
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review group process, which of necessity excludes the CCAs, and also excludes other parties which may not have the resources to participate on all the issues covered in PRG meetings.²

2. Treating Upgrades and Repowers as New Generation (Section 6.1.2)

In its opening comments, TURN agreed with the PD's clarification that upgrades or repowers to existing generation should be allowed to bid into the IOUs' new generation RFOs.³ TURN also generally agrees with the clarifications suggested by both Calpine and the Western Power Trading Forum that such upgrades should also include any "enhanced operating characteristics" that the Commission finds are needed, even when a plant's maximum capacity is not increased.⁴

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² See, especially, Office of Ratepayer Advocates, p. 2; See, also, California Environmental Justice Alliance and Sierra Club, pp. 6-8, MCE, p. 12-13.

³ TURN Opening Comments, p. 5.

⁴ Comments of Calpine (p. 2) and Opening Comments of Western Power Trading Forum (pp. 1-3). TURN is *not* endorsing these parties' proposals to eliminate the distinction between existing and new generation in IOU Requests for Offers.