

**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.

R. 12-03-014
(Filed March 22, 2012)

**RESPONSE OF MARIN CLEAN ENERGY TO
PETITION FOR MODIFICATION**

Jeremy Waen
Regulatory Analyst
MARIN CLEAN ENERGY
781 Lincoln Avenue, Suite 320
San Rafael, CA 94901
Telephone: (415) 464-6027
Facsimile: (415) 459-8095
E-Mail: jwaen@mceCleanEnergy.org

August 28, 2014

**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.

R. 12-03-014
(Filed March 22, 2012)

**RESPONSE OF MARIN CLEAN ENERGY TO
PETITION FOR MODIFICATION**

Pursuant to Rule 16.4(f) of the Rules of Practice and Procedure of the Public Utilities Commission of the State of California (“Commission”), Marin Clean Energy (“MCE”) hereby responds to the Petition for Modification of Decision 14-03-004 (“Decision”)¹ of the Alliance for Retail Energy Markets and the Direct Access Customer Coalition (“Petitioners”) filed July 29, 2014 (the “CAM Petition”).

In their CAM Petition, Petitioners seek clarification that procurement sought under the Decision by Southern California Edison (“SCE”) and San Diego Gas and Electric (“SDG&E”) through the Cost Allocation Mechanism (“CAM”) must be requested by SCE and SDG&E and must be authorized by the Commission. MCE supports Petitioners’ request for clarification.

The request of Petitioners is time-sensitive. In the SDG&E Application 14-07-009 (“Carlsbad Application”), SDG&E seeks approval of and cost recovery for a Power Purchase and Tolling Agreement with the Carlsbad Energy Center (“Carlsbad PPA”). Therein, SDG&E requests recovery of a significant portion of the costs of the Carlsbad PPA through application of the CAM. SDG&E appears to presume that the Decision conclusively establishes that CAM

¹ This is the Commission’s decision relating to the retirement of the San Onofre Nuclear Generating Station (“SONGS”).

treatment should apply to all resource acquisitions authorized by D.14 -03-004.² Such a presumption is improper, and reflects what MCE perceives to be an increasing and concerning trend by the investor-owned utilities to claim that all new resource acquisitions should be given CAM treatment. MCE files this response to correct this presumption.

MCE thanks the Commission for its attention to the matters addressed herein and asks the Commission to adopt the recommendations of the Petition.

Respectfully submitted,

/s/ Jeremy Waen

Jeremy Waen
Regulatory Analyst
MARIN CLEAN ENERGY
781 Lincoln Avenue, Suite 320
San Rafael, CA 94901
Telephone: (415) 464-6027
Facsimile: (415) 459-8095
E-Mail: jwaen@mceCleanEnergy.org

August 28, 2014

² See Carlsbad Application at 8.