

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

|  |   |                           |
|--|---|---------------------------|
| Order Instituting Rulemaking to Develop        | ) |                           |
| Additional Methods to Implement the California | ) | Rulemaking: 06-02-012     |
| Renewables Portfolio Standard Program          | ) | (Filed February 16, 2006) |
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**Opening Comments  
of the California Wind Energy Association,  
the California Cogeneration Council,  
the Large-scale Solar Association, and  
the Solar Alliance  
on the Proposed Decision of ALJ Simon**

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On Behalf of  
**CALIFORNIA WIND ENERGY ASSOCIATION,  
CALIFORNIA COGENERATION COUNCIL,  
LARGE-SCALE SOLAR ASSOCIATION, and  
THE SOLAR ALLIANCE**

October 6, 2008

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**Opening Comments of the California Wind Energy Association,  
the California Cogeneration Council, the Large-scale Solar Association, and  
the Solar Alliance on the Proposed Decision of ALJ Simon**

In accordance with the Commission’s Rule 14.3, the California Wind Energy Association (CalWEA), the California Cogeneration Council (CCC), the Large-scale Solar Association (LSA), and the Solar Alliance (SA) hereby submit opening comments on the Proposed Decision of ALJ Anne Simon (PD) on methodological issues associated with the 2008 market price referent (2008 MPR). CalWEA, CCC, LSA, and SA (CalWEA *et al.*) share the same positions on issues concerning the 2008 MPR, and filed joint post-workshop comments on June 6 and 18, 2008.

CalWEA *et al.* commend ALJ Simon for a thoughtful and comprehensive PD, and are pleased to support most aspects of the draft decision. In particular, CalWEA *et al.* support the following provisions of the PD:

- **The MPR should remain public.** The PD finds that Pacific Gas & Electric (PG&E) and the other investor-owned utilities (IOUs) presented no evidence that RPS bidders “chase the MPR.” In a time of rising fossil fuel prices and power plant construction costs, it is logical for RPS bids to increase as well, and this does not mean that the public nature of the MPR price distorts the market for renewable generation. *PD, at 30 -32.*
- For the MPR **gas price forecast**, the PD adopts the use of the full 12 years of NYMEX gas price data. In addition, CalWEA *et al.* can support the PD’s new method for setting the price in year 13 and beyond, an approach that is close to the proposals of CalWEA *et al.* and the Union of Concerned Scientists. The PD’s adopted changes to the MPR gas forecast will move the method closer to capturing the full costs of a fixed-price supply of

natural gas for all years used in the MPR model, as required by statute.<sup>1</sup> *PD, at 11.*

- CalWEA *et al.* also believe that the PD's direction to use California basis adjustments that are consistent with the underlying Henry Hub data sources is reasonable and uses the best available information. *PD, at 12-13.*
- CalWEA *et al.* support the PD's findings that **the GHG Adder should become a permanent part of the MPR** and that Energy Division staff should use GHG mitigation values from **up-to-date, comprehensive, and public models** of the costs of reducing GHG emissions. *PD, at 28.*
- The PD correctly determines that the MPR model's 2004 - 2005 values for **combined-cycle gas turbine (CCGT) capital costs** need to be inflated to the present using more realistic and up-to-date cost indices. *PD, at 20-21.*
- The PD is reasonable in requiring the **escalation in CCGT capital costs** to continue for five years after the current year. *PD, at 22-23.*
- The PD directs Energy Division to extend the MPR model to **25-year contracts**, because at times the IOUs have negotiated non-standard RPS contracts with terms of 25 years. CalWEA *et al.* note that the PD is careful not to prejudge the issue of whether the utilities should be required to offer 25-year RPS contracts, an issue that is not within the scope of this case. *PD, at 24.*

CalWEA *et al.* will not comment further on these issues, in deference to the Commission's rules that ask parties to focus on errors in proposed decisions. To the extent that other parties challenge any of the above aspects of the PD, we will respond in reply comments.

As set forth below, CalWEA *et al.* recommend changes to the PD in four areas.

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<sup>1</sup> § 399.15(c)(2) of the Public Utilities Code.

## I. THE MPR MODEL SHOULD USE A REALISTIC CCGT CAPACITY FACTOR.

The PD adopts TURN's position that the MPR model should use a 92% "technical" capacity factor for the benchmark CCGT plant, in essence assuming that the CCGT operates as a base load plant. The PD begins its discussion of this issue by observing that "the fundamental purpose of the MPR in RPS procurement is to 'establish a methodology to determine the market price of electricity. . . ' [§ 399.15(c)]." The PD also seeks a method that is simple and transparent. Earlier, the PD notes that § 399.15(c)(3) requires the Commission to establish a MPR methodology that reflects accurately the costs of several electricity products – base load, peaking, and as-available. Prior to D. 05-12-042, the Commission actually set separate base load and peaking MPRs: the base load MPR used CCGT costs with TURN's "technical" capacity factor of 92%, while the peaking MPR was based on a simple-cycle combustion turbine (CT) peaker.<sup>2</sup>

In D. 05-12-042, the Commission attempted to simplify the MPR by combining the base load and peaking MPRs into a single MPR determined by allowing each IOU to apply its time-of-delivery (TOD) factors to the costs of a CCGT. The peaking MPR then became the single MPR times the utility's on-peak TOD factor.<sup>3</sup> The Commission also determined that the TOD factors should be applied to a CCGT cost calculated using a realistic, "economic" capacity factor, and adopted a method to calculate that capacity factor that relied on the utilities' TOD factors. Over time, it has become very clear that the IOUs' TOD factors are problematic – they are not transparent, they vary widely from utility to utility even though the utilities operate in closely-linked markets, and they produce widely varying CCGT capacity factors based on the method adopted in D. 05-12-042.<sup>4</sup> For example, the 2007 summer on-peak TOD factors for PG&E, Edison, and SDG&E were 3.28, 2.037, and 1.64, respectively. One of the few details

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<sup>2</sup> See the 2004 base load and peaking MPRs adopted in Resolution E-3942.

<sup>3</sup> D. 05-12-042, at 30-35. Each utility's set of TOD factors average 1.0 over all hours of the year.

<sup>4</sup> See CalWEA / CCC / CSP Pre-workshop Comments, at 7-11.

concerning the IOUs' TOU factors that has come to light is the fact that SDG&E's RPS TOU factors are energy-only factors, and are not "all-in" factors that combine both energy and capacity values.<sup>5</sup> The lack of any capacity value in SDG&E's summer on-peak TOD factor is why its 2007 factor is just 50% of Edison's summer on-peak TOD factor. Thus, it is highly questionable whether SDG&E's factors are appropriate for use in time-differentiating the MPR, which is an all-in price combining both energy and capacity. Even TURN acknowledges that the IOUs' TOD factors are not consistent,<sup>6</sup> and the Commission has indicated that it will review TOD factors in the next long-term procurement plan proceeding.<sup>7</sup> Given the problems with the utility TOD factors, the PD takes the wrong course in finding that we can rely entirely on the TOD factors to produce a time-differentiated MPR that correctly reflects the economic value of both base load and peaking products, as required by § 399.15(c)(3).

Let's assume, for argument's sake, that the use of a 92% capacity factor is appropriate for the base load MPR, as TURN argues and the PD accepts. Does this result in a reasonable peaking MPR? **Table 1** uses the adopted 2007 MPR model to calculate the MPR for a 20-year contract starting in 2009 using a 92% CCGT capacity factor – \$91 per MWh. The table then applies the utilities' summer on-peak TOD factors to the \$91 per MWh MPR to calculate the peaking MPR. The peaking MPRs vary widely because the utilities' on-peak TOD factors are not consistent. The table also shows the California Energy Commission's (CEC) 2007 cost of simple-cycle CT peaking capacity from the generation cost study prepared for the *2007 Integrated Energy Policy Report*,<sup>8</sup> based on virtually identical natural gas costs and the same capacity factors used for the peaking MPRs. Clearly, the utilities' existing TOD factors applied to an MPR using a 92% capacity factor produces peaking MPRs that are far too low compared to

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<sup>5</sup> SDG&E Advice Letter 1952-E, at pages 8 and 9: "SDG&E's MPR TOD factors are appropriate for an energy market application because they do not include an additional capacity cost component."

<sup>6</sup> TURN Post-workshop Comments, at 7.

<sup>7</sup> D. 08-07-048, at 3 and Ordering Paragraph 1, modifying D. 07-09-040.

<sup>8</sup> Available on the CEC website at <http://www.energy.ca.gov/2007publications/CEC-200-2007-011/CEC-200-2007-011-SF.PDF>.

**Table 1**

**Calculation of the Peaking MPR**

| <u>Utility</u>      | 2007 MPR in<br><u>2009</u> [1]<br>\$/MWh | Summer<br>On-peak<br><u>TOD Factor</u> | <u>Peaking MPR</u><br>\$/MWh | <u>Capacity factor</u><br>% |
|---------------------|--|--|------------------------------|-----------------------------|
| PG&E                | \$91                                     | 2.04                                   | \$185                        | 7.8%                        |
| SCE                 | \$91                                     | 3.28                                   | \$297                        | 5.8%                        |
| SDG&E               | \$91                                     | 1.64                                   | \$149                        | 7.8%                        |
| Average             | \$91                                     | 2.32                                   | \$210                        | 7.1%                        |
| CEC 2007 IEPR       |  |  | \$600                        | 5.0%                        |
| simple-cycle CT [2] |  |  | \$483                        | 7.1%                        |
|                     |  |  | \$357                        | 9.4%                        |

**NOTES:**

[1] Uses 2007 MPR for 20 years starting in 2009, with a 92% capacity factor for the CCGT.

[2] Source: Table 27: 2007 IEPR vs. 2003 IEPR – Simple Cycle CT  
in CEC Comparative Generation Cost Study (# CEC-200-2007-011-SF)

the CEC benchmark for the cost of peaking capacity.

How can we remedy this? Reforming the IOUs' TOD factors is beyond the scope of this proceeding. The best we can do in this case is to use a lower, more realistic capacity factor for the CCGT. The adopted 2007 MPR used a more realistic 76% capacity factor, and this increased the 2007 MPR for a 20-year contract starting in 2009 from \$91 to \$97 per MWh. This 6% increase in the MPR represents less than a third of the increase in the overall MPR that would result from increasing the peaking MPR shown in Table 1 to a level comparable with the CEC peaking values.<sup>9</sup> Thus, although the use of a realistic capacity factor in the MPR does not correct completely the shortfall in the peaking MPR, it does achieve a better balance between the peaking and the base load MPRs. We are asking the time-differentiated MPR to represent the costs of multiple products, and given the inconsistencies and plain errors in the utilities' TOD factors, the use of a realistic CCGT capacity factor achieves a more balanced and equitable valuation of all of the products that the MPR must represent.

Another way to look at the time-differentiated MPR is as the measure of the all-in market price for electric supplies in California – in other words, the all-in costs of the marginal electric resource. During the high-demand on-peak hours, the all-in market price is well above the all-in costs for a CCGT, and a resource that is more expensive than a CCGT (a CT) is on the margin. During these on-peak hours, the time-differentiated MPR also must serve as the proxy for a peaking resource. As a result, the all-in market price in California during peak hours exceeds what is necessary to compensate a base load CCGT, because a more expensive CT is the marginal resource.<sup>10</sup> As a result, the MPR price averaged over all hours exceeds the cost of a CCGT at a 92% capacity factor. Edison complains about this, but the utility ignores the fact that

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<sup>9</sup> For example, increasing the peaking MPR to align with CEC values, i.e. from \$210 to \$483 per MWh in 7.1% of the hours of the year, would increase the overall MPR by \$19 per MWh (i.e. an increase of \$273 per MWh times 0.071).

<sup>10</sup> California does not actually have an all-in market that would enable a CCGT to over-earn during peak periods. In reality, a CCGT will be limited by competition with other CCGTs to recover no more than its costs during the peak period.

the present MPR also functions to determine the MPR for a peaking resource. A more expensive CT, not a CCGT, is the marginal unit during peak hours, and the MPR needs to capture these costs as well as the costs for a base load resource. TURN's 92% capacity factor assumes that a CCGT operating as a base load resource is the marginal unit in all hours, including peak hours. This ignores the reality that simple-cycle CTs – a more expensive resource than a CCGT – are being built in California to provide peaking power.<sup>11</sup> During on-peak hours, the all-in market price in California exceeds what is necessary to compensate a CCGT, because more expensive CTs are the marginal resource.

In setting the MPR, the Commission cannot ignore the higher all-in costs of CT peaking resources – indeed, the RPS statute requires the Commission to consider the costs of peaking as well as base load resources. The proposals of TURN and Edison at best would be adequate for a base load MPR; they are not adequate for an MPR that must represent the costs of multiple power products, including peaking as well as base load products.<sup>12</sup> The reality of all-in marginal costs in the California market today for both base load and peaking products is that they are best, if imperfectly, represented by the time-differentiated costs of a CCGT operating at a realistic capacity factor, as CalWEA *et al.* have shown in Table 1 above and in our other presentations in this case.

The one change that needs to be made to the methodology adopted D. 05-12-042 is to find a simpler and more transparent method to calculate a realistic capacity factor for the CCGT. CalWEA *et al.* have proposed such a method, using the simple daily dispatch model for a CCGT that the California Independent System Operator (CAISO) has used for many years. The CAISO method, using recent historical daily gas and electric prices, produces stable, consistent, and realistic CCGT capacity factors averaging about 70%. The CAISO has shown consistent results

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<sup>11</sup> Edison itself completed four such units in 2007.

<sup>12</sup> Indeed, the Commission used the 92% technical capacity factor for the CCGT in the 2004 MPR, when the CCGT was used solely to set the base load MPR price. *See* Resolution E-3942 adopting a staff report on the 2004 MPR.

using this approach over a number of years in which the California market has experienced a wide range of gas and electric market prices.

II. THE COLUSA PLANT'S COST CAP CANNOT BE INCLUDED IN THE MPR DATA SET OF COMBINED-CYCLE CAPITAL COSTS UNLESS MORE INFORMATION ON PG&E'S ACQUISITION OF COLUSA IS MADE PUBLIC.

TURN and Edison proposed that the cost cap approved for the Colusa combined-cycle gas turbine (CCGT) plant should be included in the MPR data set of installed CCGT capital costs.<sup>13</sup> The PD, at page 20, allows the Energy Division staff to include the Colusa cost cap in the MPR data set, if the staff justifies the inclusion of this data in its draft resolution.

Pages 19-20 of the PD explain the background for this issue: in essence, PG&E acquired the Colusa plant from a developer who was unable to complete the project. Past CPUC orders on the MPR establish clearly that cost data from “distressed” or partially-completed power plants that are then acquired by a utility should not be used to set the MPR, unless there are detailed data available on the considerations received by each side to the sale of such a project.<sup>14</sup> As explained in the PD, “D.05-12-042 determined that staff could use data from plants sold in secondary market transactions if sufficient data are publicly available for staff and parties to be able to evaluate the cost information.”<sup>15</sup> Although the Commission approved the Colusa cost cap (and made the cost cap public) in D. 08-02-019, the Commission has not make public sufficient data to allow the parties to evaluate whether PG&E received consideration from the original developer that is not included in the approved cost cap. D. 05-12-042 clearly requires that such details must be disclosed to the parties as well as to Energy Division staff, if the cost cap for a distressed plant such as Colusa is to be used in the MPR data set. CalWEA *et al.* submit that the

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<sup>13</sup> TURN Post-workshop Comments, at 1. Edison Post-Workshop Comments, at 2-3. Edison refers to this plant as “Colusa 8,” which appears to be a confusion with PG&E’s other new CCGT – Contra Costa Unit 8, now called Gateway.

<sup>14</sup> D. 05-12-042, at 26-27 (emphasis added).

<sup>15</sup> PD at 20 (emphasis added).

PD should be modified to provide that the Colusa cost cap cannot be used in the MPR data set until this hurdle is cleared and the details of PG&E's acquisition of this plant have been made public to the parties to this docket.

Furthermore, even PG&E, who obviously knows these details about Colusa, did not originally support the use of the Colusa cost cap. PG&E first argued that the Colusa cost cap should not be used for the MPR, because it may not accurately reflect the project's actual costs, including the possibility that the plant may earn certain performance incentives above the cost cap.<sup>16</sup> Thus, the PD also should specify that, if the Colusa cost cap is to be used in the MPR data set, PG&E must supply an estimate of the performance incentives that the plant is likely to earn.

### III. THE LINE LOSS ADJUSTMENT CAN BE REMOVED FROM THE MPR USED IN AMF CALCULATIONS, BUT THIS SHOULD NOT PREJUDGE INCLUDING LOCATIONAL VALUES IN THE MPR-BASED AB 1969 FEED-IN TARIFFS.

The current MPR model uses a CAISO generation meter multiplier (GMM) of 0.985 as the measure of average line losses on the CAISO system, in other words, average line losses of 1.5%. CalWEA *et al.* have shown that actual CAISO system average transmission lines losses are 3.1%. The current MPR model understates losses because it uses an incorrect simple average of CAISO line loss factors for generators in the state, instead of an accurate generation-weighted average.<sup>17</sup> Because the current MPR model includes a line loss factor that represents losses incurred in moving power from a generator's busbar to the load center, the current MPR is priced at the load center.

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<sup>16</sup> PG&E Post-workshop Comments, at 3. PG&E argued as follows:

“...the manner by which the cost cap was established makes Colusa unsuitable for inclusion in the market survey. The cost cap is based upon a forecasted stream of payments payable under a Purchase and Sale Agreement ("PSA"). The seller's compensation pursuant to the PSA is subject to variation, however, due to the inclusions of performance incentives and penalties which originated as part of the PSA structure and were carried over into the ownership cost model. This injects a “significant unknown” into the cost cap, so, like partially completed projects that fall into a “secondary market,” simply using the cost cap would be inappropriate.”

<sup>17</sup> CalWEA *et al.* Pre-workshop Comments, at 11-13 and Table 4.

The PD would adopt a proposal from SCE that essentially changes the point at which the MPR is assessed, from the load center to the busbar.<sup>18</sup> SCE asserts that CCGTs typically are paid for power at the busbar; therefore, the MPR should be calculated as a busbar cost, and the line loss adjustment should be removed from the MPR calculation. The PD accepts this argument.

Today, the MPR serves two important functions. The first purpose of the MPR is to establish a benchmark that allows the Commission to determine the above-market costs associated with each RPS contract. If the MPR is a busbar cost, as the PD specifies, then the amount of above-market funds (AMFs) required for any RPS generator also must be calculated at the busbar, by comparing the MPR to the RPS generator's bid price calculated at the busbar. We understand from discussions with Energy Division staff that AMFs are calculated at the busbar; therefore, for the purpose of assessing the above-market costs associated with the RPS program, it is reasonable to calculate the MPR at the busbar and to remove the line loss adjustment, as SCE and the PD propose. CalWEA *et al.* caution the Commission, however, that many RPS contracts specify that the contract delivery point is at the load center (e.g. at NP-15 or SP-15), and thus the prices in these contracts will need to be adjusted back to the busbar in order to calculate AMFs accurately.

The second vital function of the MPR is to serve as the price in the AB 1969 feed-in tariffs (FITs) for small, distributed renewable generation. In this context, CalWEA *et al.* have a major problem with the use of a single, statewide MPR, calculated at the busbar, for the price in all AB 1969 contracts, regardless of where the small renewable generator is located. The fundamental purpose of the AB 1969 feed-in tariffs is to encourage small renewable generation projects of 1.5 MW or smaller that would otherwise have difficulty obtaining RPS contracts.<sup>19</sup> In

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<sup>18</sup> PD, at 23.

<sup>19</sup> In D. 07-07-027, the Commission noted that “these ‘feed-in tariffs’ present a simple mechanism for small renewable generators to sell power to a utility at predefined terms and conditions, without contract negotiations.” CPUC President Michael Peevey observed that the AB 1969 feed-in tariffs would allow small generators to participate in the RPS program, because “up until now, only large renewable generators were able to

addition, these projects can be sited in or near the major load centers and on the utilities' distribution systems, such that major transmission upgrades are not required and the renewable generation can provide valuable local generation that promotes a more reliable grid. None of these beneficial attributes will be reflected in the AB 1969 price, if that price is a single, statewide value that is the same at every busbar in California.

CalWEA *et al.* recognize that the scope of this proceeding does not include the pricing of power under AB 1969 FITs, and acknowledge that the Commission recently took comments in R. 06-05-027 on needed changes to the AB 1969 FIT program. In that proceeding, a number of parties representing renewable generators, including the Solar Alliance, have proposed that the MPR-based pricing applicable to AB 1969 contracts should include the quantifiable, locational impacts of where the small renewable generation is sited.<sup>20</sup> In order to avoid serious confusion in R. 06-05-027 and in the market for distributed renewable generation, the PD in this case should state explicitly that the Commission's determination that the MPR is a busbar value for the purpose of calculating AMFs does not prejudge the issue of the locational valuation of renewable distributed generation that is now under consideration in R. 06-05-027.

#### IV. THE E3 GHG VALUES ADOPTED IN D. 04-12-048 DO NOT COMPLY WITH THE PD'S CRITERIA FOR UP-TO-DATE GHG MITIGATION VALUES.

The PD adopts the following criteria for the models that will be used to establish GHG mitigation values in the MPR model, beginning in 2012 with the full implementation of AB 32:

- publicly available;
- based on multiple scenarios and sources of information;
- based on realistic and public assessments of policy proposals and scenarios; and

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effectively participate in the RPS program.” See the CPUC's February 14, 2008 press release, “CPUC Approves Feed-In Tariffs...,” available at [http://docs.cpuc.ca.gov/WORD\\_PDF/NEWS\\_RELEASE/78824.PDF](http://docs.cpuc.ca.gov/WORD_PDF/NEWS_RELEASE/78824.PDF).

<sup>20</sup> See the July 9, 2008, comments of the Vote Solar Initiative and Recurrent Energy, Inc. on the AB 1969 FITs, filed in R. 06-05-027, at 21-28. Also see the March 6, 2008, comments of GreenVolts, Cleantech America, and the Community Environmental Council on the 2008 MPR, filed in this docket.

- based on the most current reliable information that conforms to the other three criteria.<sup>21</sup>

CalWEA *et al.* concur that these criteria are reasonable for the models or studies used to establish the GHG mitigation values used in the MPR.

Unfortunately, the PD then opines that either the “E3 model” adopted in D. 04-12-048 or the Synapse Energy Economics model examined in this proceeding meet these criteria and could be used by staff for the 2008 MPR. CalWEA *et al.* strongly disagree with the PD’s conclusion that the E3 GHG values adopted in D. 04-12-048 comply with all of the above criteria, particularly the final criteria that the GHG values must be “based on the most current reliable information.” The GHG values included in the “E3 model” were published four years ago in October 2004 by the E3 consulting firm in its report to the Commission on the avoided costs associated with energy efficiency programs.<sup>22</sup> In that report, E3 reviewed modeling work from 1999 - 2001 on reaching the CO<sub>2</sub> emission targets under the Kyoto Protocol and limited data from the initial efforts in European Union (EU) countries to trade carbon offsets. E3 chose these values from the low end of the spectrum of GHG emission costs that it examined, and characterized them as “reasonable and conservative, albeit uncertain.”<sup>23</sup> Although E3’s 2004 analysis was a significant, path-breaking effort for 2004, much has happened since then, including the passage of AB32, the California Air Resources Board’s (CARB) approval of early action measures to reduce GHG emissions, progress in formulating regional GHG reduction strategies in many parts of the U.S., the opening of the European Union’s continent-wide carbon market, and increasing efforts to form an international consensus that moves beyond the Kyoto Protocol. We believe that the most recent information on the expected long-term costs of GHG mitigation measures, including the costs of CARB’s early action measures, shows that the 2004

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<sup>21</sup> PD, at 28.

<sup>22</sup> “Methodology and Forecast of Long-term Avoided Costs for the Evaluation of California Energy Efficiency Programs,” prepared by E3 for the CPUC’s Energy Division (October 25, 2004); hereafter, the “E3 Report.” The E3 Report is available at [www.ethree.com/cpuc\\_avoidedcosts.html](http://www.ethree.com/cpuc_avoidedcosts.html). See Section 2.4.4, pages 82-89, of the E3 Report for its discussion of the costs of mitigating GHG emissions.

<sup>23</sup> *Ibid.*, at 89.

E3 GHG values used in the 2007 MPR's GHG adder are understated.<sup>24</sup>

In contrast to E3's 2004 work, the August 2006 Synapse Energy Economics (Synapse) study reviewed a wide range of more recent models of long-term GHG mitigation costs, including models run by EIA, EPA, MIT, and the Tellus Institute between 2003 and 2006.<sup>25</sup> Moreover, Synapse updated its projections for GHG allowance costs in August 2008. This current study is the work that CalWEA *et al.* recommend that the Commission should use in determining the GHG adder for the 2008 MPR.<sup>26</sup> We believe that this most up-to-date Synapse study meets all of the criteria set forth in the PD, including providing the “most current reliable information.”

CalWEA, CCC, LSA, and SA appreciate the Commission's attention to these opening comments on ALJ Simon's Proposed Decision on the 2008 MPR. We urge the Commission to make changes to the text of the PD, for the reasons set forth in the body of these comments.

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<sup>24</sup> CalWEA *et al.* summarized the costs of some of these early-action measures in its Pre-workshop Comments, at 18 and Table 5.

<sup>25</sup> Synapse Energy Economics, “Climate Change and Power: Carbon Dioxide Emissions Costs and Electricity Resource Planning,” at 50-55. This study is an attachment to testimony filed before the Florida Public Service Commission in March 2007, and is available at <http://www.synapse-energy.com/Downloads/SynapseTestimony.2007-03.Earthjust.FPL-Glades-Coal-Plants-GHG-&-CO2.07-017A.pdf>.

<sup>26</sup> The August 2008 Synapse update is available at <http://www.synapse-energy.com/Downloads/SynapsePaper.2008-07.0.2008-Carbon-Paper.A0020.pdf>.

There does not appear to be a need to change the findings of fact and conclusions of law that are included in the PD.

Respectfully submitted,

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October 6, 2008

## CERTIFICATE OF SERVICE

I hereby certify that I have this day caused to be served a copy of the foregoing document, **Opening Comments of the California Wind Energy Association, the California Cogeneration Council, the Large-scale Solar Association, and the Solar Alliance on the Proposed Decision of ALJ Simon**, by Electronic Mail where possible and First-Class Mail where not, on all known parties to R. 06-02-012, named on the service list attached to the original certificate of this document pursuant to the Commission's Rules of Practice and Procedure.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Berkeley, California, Monday, October 6, 2008.

/s/ Christa Goldblatt

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