

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

Order Instituting Rulemaking to Implement the  
Commission's Procurement Incentive Framework  
and to Examine the Integration of Greenhouse Gas  
Emissions Standards into Procurement Policies

Rulemaking 06-04-009  
(Filed April 13, 2006)

**COMMENTS OF THE CALIFORNIA WIND ENERGY ASSOCIATION, ABENGOA  
SOLAR, INC., AUSRA, INC., AND BRIGHTSOURCE ENERGY, INC.  
ON THE PROPOSED DECISION OF PRESIDENT PEEVEY  
ON THE INTERIM OPINION ON GREENHOUSE GAS REGULATORY STRATEGIES**

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February 28, 2008

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**I. INTRODUCTION**

In accordance with Rule 14.3 of the California Public Utilities Commission's ("Commission's") Rules of Practice and Procedure, the California Wind Energy Association ("CalWEA"), BrightSource Energy, Inc. ("BrightSource"), Ausra, Inc. ("Ausra"), and Abengoa Solar, Inc. ("Abengoa"), (collectively "CalWEA *et al.*"), hereby submit comments on the Proposed Decision of President Peevey on Interim Opinion on Greenhouse Gas Regulatory Strategies ("PD"), dated February 8, 2008.

In the PD, the Commission and the California Energy Commission ("Energy Commission") will recommend to the California Air Resources Board ("ARB") a number of measures for greenhouse gas ("GHG") emissions reductions from the electricity and natural gas sectors in California, to be adopted as part of the ARB's scoping plan for implementing Assembly Bill 32.<sup>1</sup> The PD would recommend that the ARB adopt a mix of direct mandatory regulatory requirements and a cap-and-trade system for the electricity and natural gas sectors.<sup>2</sup>

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<sup>1</sup> PD, p. 2 (Feb. 8, 2008).

<sup>2</sup> *Id.*

Consistent with the Final Climate Action Team Report to the Governor and the Legislature,<sup>3</sup> the PD states that energy efficiency and renewable energy are “the priorities and best available approaches to drive GHG reductions in California’s electricity sector.”<sup>4</sup> CalWEA *et al.* strongly supports the PD in its rejection of the argument that “we should eliminate mandatory targets for energy efficiency and/or renewables, and allow an AB 32 cap to govern instead.”<sup>5</sup>

Yet, the PD would stop short of raising the twenty percent (20%) RPS goal, “leav[ing] open consideration of exact percentage requirements or deadlines, pending further analysis.”<sup>6</sup> The PD would instead recommend that the Commission, Energy Commission, and the ARB “jointly seek legislation that requires retail electricity providers to obtain a greater proportion of their power from renewables by a date certain, with flexibility to allow the Public Utilities Commission and/or ARB to require exceeding that level under certain conditions (subject to a cost-effectiveness evaluation, for example).”<sup>7</sup>

For reasons discussed below, CalWEA *et al.* strongly urge the Commission to modify the PD to advocate that the ARB and/or the Legislature firmly establish the 33%-by-2020 RPS target that the Commission and Energy Commission have adopted as a goal. If that target is not firmly established, it is much less likely to be achieved.

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<sup>3</sup> PD, p. 76. The Final Climate Action Team Report was presented to the Legislature in March 2006.

<sup>4</sup> PD, p. 3.

<sup>5</sup> PD, p. 30.

<sup>6</sup> PD, p. 3.

<sup>7</sup> PD, p. 30.

## II. DISCUSSION

### A. The Cost of the RPS is Self-Regulating; Therefore, Attempts to Predict Cost-Effectiveness are Not Needed or Warranted

The PD suggests that the Commission should establish RPS goals subject to a cost-effectiveness evaluation.<sup>8</sup> This ignores the fact that the RPS design ensures that renewables will not be acquired if their cost exceeds the cost of the resource that would otherwise be acquired. This occurs through the market-price referent (“MPR”), as set forth in both Commission decisions and statutes.<sup>9</sup>

Under present regulation, the MPR is equal to the “all-in” costs of a state-of-the-art natural gas combined-cycle plant built in California, including direct air quality impact abatement costs and the cost of GHG allowances. This design ensures that a thirty-three percent (33%) RPS would be a “no additional cost” policy with a built-in linkage to actual GHG mitigation costs as they eventually reveal themselves in California.

The indirect costs of renewables, namely associated transmission and system integration costs, are also taken into account in the RPS policy through the “least-cost, best-fit” bid evaluation process.<sup>10</sup> These costs are a relatively small fraction of the bid price, just as transmission costs are generally a small part of customer utility bills. The reformed generation interconnection and transmission planning process that the California Independent System Operator (“CAISO”) is now developing should produce better estimates of transmission costs than those currently in use. Further, integration costs attributable solely to new renewable generation will be reduced in the future, because the CAISO will plan for generation

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<sup>8</sup> *Id.*

<sup>9</sup> *See, e.g.*, Commission Decision 07-09-040 (Sept. 20, 2007).

<sup>10</sup> Some facsimile of this process, and the MPR, could be applied as part of a mandate for publicly owned utilities as well.

interconnections and other “network” needs simultaneously through the CAISO’s transmission planning process.

Thus, attempts to predict cost-effectiveness are not needed or warranted; there is little downside to adopting a thirty-three percent (33%) RPS, and there is much to lose in not establishing that goal, as discussed next.

**B. In Order To Achieve Thirty-Three Percent (33%) Renewables by 2020, that Goal Must Be Firmly Established**

**i. Establishing a continuing market for renewable energy is necessary to retain private sector interest in the California market.**

Global demand for renewable energy is very strong, with many attractive markets both within the U.S. and in other countries. California is a very difficult and expensive state in which to obtain contracts, build projects, and conduct business generally. The combination of these two factors makes it difficult for development companies and investors to allocate their human resources and available capital to the California market.

As retail sellers fulfill their twenty percent (20%) RPS obligation through signed contracts,<sup>11</sup> renewable energy developers and their investors will have a much harder time justifying continued involvement in the California market, given other attractive opportunities. Indeed, some of our members already have a difficult time obtaining a share of company resources to focus on California, given the difficulty and expense of doing business here. Likewise, without a rising RPS requirement, California’s retail sellers will be less willing to err on the side of over-procurement in meeting their twenty percent (20%) RPS requirements (i.e., acquiring a compliance margin).

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<sup>11</sup> The State’s investor-owned utilities have sufficient signed contracts and short-listed bids to more than fulfill their twenty percent (20%) obligation, according to a presentation made to CalWEA by the Commission’s Anne Gillette in October 2007.

To maintain the substantial market activity that has developed as a result of the twenty percent (20%) RPS requirement, it is important that California is serious about renewable energy. CalWEA *et al.* appreciates that it is the Commission's intent to continue to expand renewable generation in California. However, the language in the PD raises many questions about that intent: how quickly does the Commission intend to move beyond twenty percent (20%) by 2010? What structure will be used to do so? How long will it take to implement that structure? Given such questions, the PD will not promote the confidence the industry needs to make a strong commitment to California for the next twelve years. A strong statement from the Commission to the ARB that California still stands behind its RPS goal of thirty-three percent (33%) renewable by 2020, however, will promote such confidence.

**ii. Private investment is necessary to promote the transmission infrastructure that is necessary to achieve higher renewable energy targets.**

Continued private investment in California's market will be needed to drive the development of the transmission infrastructure that will be essential to achieve higher RPS goals, and to otherwise develop project sites.

Under the CAISO's current generation interconnection process, and under the reformed generation interconnection and transmission planning process that the CAISO currently developing, developers must make substantial payments upon signing an interconnection agreement to obtain the necessary transmission upgrades. Significant study costs are imposed prior to that point in the process. Without signed power purchase agreements or the strong prospect of such, developers will not make these investments, and the necessary transmission upgrades will not occur.

Given the five to seven years' lead time that it takes to plan, permit and construct transmission, these deposits must be made soon if RPS targets for 2015 are going to be met.

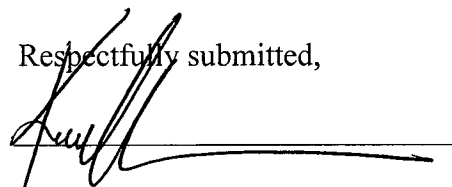
Thus, a higher RPS target must be established in 2008, or 2009 at the latest. Moreover, a firm RPS requirement for the post-2010 period will give the CAISO a firm basis for planning the transmission system accordingly, in concert with developer commitments.

In addition, establishing a higher RPS target will put greater emphasis on the need to plan the rest of the system accordingly – e.g., deterring utility commitments to additional fossil fuel resources, and promoting the use of existing system resources whose capabilities are inherently flexible (including hydro, pumped hydro storage, and dispatchable fossil fuel resources as well as some large loads) as a complement to renewable resources.

### III. CONCLUSION

For the foregoing reasons, CalWEA *et al.* respectfully request that the Commission modify the PD to advocate that the ARB and/or the Legislature firmly establish the 33%-by-2020 RPS target that the Commission and Energy Commission have adopted as a goal.

Respectfully submitted,



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## Certificate of Service

I hereby certify that I have this day served a copy of the  
***Comments of the California Wind Energy Association, Abengoa Solar, Inc., Ausra, Inc. and  
Brightsource Energy, Inc. on Proposed Decision of President Peevey on Interim  
Opinion on Greenhouse Gas Regulatory Strategies***

on all known parties to R.06-04-009 by sending a copy via electronic mail and by mailing a properly addressed copy by first-class mail with postage prepaid to each party named in the official service list without an electronic mail address.

Executed on February 28, 2008 at San Francisco, California.

  
Rosalie Marschall

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