

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to
Continue Implementation and
Administration of California
Renewables Portfolio Standard
Program.

Rulemaking 11-05-005
(Filed May 5, 2011)

CLEAN COALITION OPENING COMMENTS ON
ORDER INSTITUTING RULEMAKING

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The Clean Coalition respectfully submits these comments on the Order Instituting Rulemaking (OIR), pursuant to OIR itself.

The Clean Coalition is a California-based policy organization, part of Natural Capitalism Solutions, a non-profit entity based in Colorado. The Clean Coalition focuses on policies that deliver cost-effective and timely clean energy, including within the underserved “wholesale distributed generation” (WDG) market segment, which is comprised of wholesale generation projects interconnected to the distribution grid. WDG is a particular focus given the combination of cost-effective energy and economic benefits that it delivers, while at the same time avoiding all of the challenges associated with transmission build-outs. The Clean Coalition is active in proceedings at the California Public Utilities Commission, California Air Resources Board, California Energy Commission, the California Legislature, US Congress, the Federal Energy Regulatory Commission, and in various local governments around California.

Our main points are as follows:

- The Governor’s goal of 12,000 MW of distributed generation by 2020 should be fully reflected in Commission priorities and policies. The Commission has launched a number of new DG programs in the last couple of years and we applaud the Commission for doing so. Much additional work remains to be done, however, if the Governor’s goal is to be met - including changes to RPS implementation and expedited implementation of SB 32
- The Clean Coalition’s top three priorities for this proceeding are: 1) SB 32 implementation (section 399.20); 2) RPS procurement and compliance modifications; 3) TREC issues.
- The Clean Coalition strongly urges the Commission to rapidly implement SB 32, a law that passed more than one and a half years ago and has yet to be implemented. In particular, we urge the Commission to quickly issue an interim decision that expands the current AB 1969 feed-in tariff to three megawatts, as SB 32 authorizes, and then later issue a second decision that addresses the remaining issues with respect to SB 32

- We also note that SB 2 (1X) provided an expanded Commission staff budget (\$322,000) to implement the new RPS, so it doesn't seem that other legislative implementation priorities should suffer as a result of SB 2 (1X)'s passage – as is implied by the OIR's request for comments on prioritization.
- The Clean Coalition believes it is imperative that the Commission create a rigorous system for monitoring conflicts of interest between utility third-party procurement programs and utility-owned generation (UOG) programs because of SB 2 (1X)'s provision allowing ¼ of the 33% RPS to be met from UOG, as well as other legislative and policy changes encouraging UOG. These developments change the landscape dramatically in terms of UOG. Utilities have a strong incentive to favor UOG over third party development and it is up to the Commission to ensure that this potential conflict of interest does not become actual.
- We urge the Commission to revise or replace the Project Viability Calculator such that it becomes a more reliable risk assessment tool – and can thus aid the Commission and other policymakers in determining how likely the utilities are to meet their RPS requirements and how much over-procurement should be required.
- We also urge the Commission to ensure that flexible compliance mechanisms for the RPS are stringently applied.
- Last, we recommend that the Commission consider, in more detail than currently planned in the OIR, transmission and interconnection issues relating to RPS achievement.

I. General Comments

A. SB 32 Issues (P.U. Code section 399.20 amendments)

The Governor has established a goal of 12,000 megawatts of distribution generation (DG) to help meet the 33% by 2020 renewable portfolio standard recently passed into law. To achieve this goal, California needs to dramatically improve its procurement and interconnection procedures for wholesale DG – the key component for meeting this 12,000 megawatt goal. Many new procurement programs are in place and the Commission has been proactive in pushing for better interconnection procedures. We again applaud the Commission for its recognition of the potential for wholesale DG to become a major market for meeting the expanded RPS. Much work remains to be done,

however, and we make a number of recommendations below that will take us far closer to meeting the Governor's ambitious goal.

SB 32 passed more than a year and a half ago and the Commission has not implemented any of its provisions. With the landscape for smaller wholesale DG projects becoming incrementally more favorable from an interconnection and permitting perspective, it is imperative that the Commission improve the ability of these projects to obtain PPAs. Projects from one to five megawatts are competing with projects 20 megawatts or larger in most of the renewable energy procurement programs (RAM, PG&E's PV program, RPS) and are losing because they don't compete well, based primarily on price, against these much larger projects. These projects can, however, still be cost-effective for ratepayers even if they are losing out to larger projects – particularly when a more accurate accounting of ratepayer benefits is included, as is allowed under SB 32 (locational benefits, etc.).

We recommend, accordingly, that the Commission quickly complete an interim decision expanding the AB 1969 feed-in tariff project size from 1.5 to 3 MW, in line with SB 32 authority. This will allow these projects to obtain PPAs quickly, kick-starting this new and very promising market niche into life, while the Commission conducts workshops on the more controversial aspects of SB 32 implementation and issues a final decision later in the year.

The Clean Coalition's primary focus is on distribution-interconnected projects 20 megawatts and smaller (WDG), so we are very appreciative of the Commission's procurement and interconnection improvements for this niche. We have also, however, long advocated for feed-in tariffs – what we now label CLEAN contracts (clean local energy accessible now), as part of a national campaign¹ - as the preferred procurement mechanism. We have described in detail in previous comments in this proceeding why we view CLEAN contracts as the preferred procurement mechanism and we won't revisit those arguments here. We describe below our further recommendations on SB 32 implementation.

¹ See the Center for American Progress' report on CLEAN Contracts: http://www.americanprogress.org/issues/2011/01/pdf/clean_contracts.pdf.

B. RPS Issues

1. Least cost, best fit and risk assessment

The Clean Coalition believes that RPS procurement decisions and oversight should take into consideration the full range of potential RPS-eligible resources, not just those resources that bid in to the solicitations. Least-cost should encompass all costs, not just bid price. Utilities should justify selection of contracts not just on price, but also on grid benefits, grid investment requirements, and, most importantly, the risk of project failure.

SB 2 (1X)'s new section 399.13(a)(4) requires a rank ordering and selection of RPS bids. For this process to work, the Commission will need to revise the existing Project Viability Calculator (PVC) or create a replacement that results in a true, up-to-date, risk assessment based on specific project data and historical project data. The PVC is currently not meant to be a risk assessment tool, despite its name. It is, rather, meant only as a way to help rank bids received. We recommend, however, that the PVC be modified or replaced such that a more accurate risk assessment tool is used to rank bids received and to guide over-procurement requirements. We previously submitted comments to the Commission on May 20, 2011, describing our recommendations for improving the PVC.

With respect to over-procurement requirements, previous studies have recommended an over-procurement target of 30 percent but the revised methodology we advocate here would allow the Commission to reassess this figure in light of recent history and in light of the likelihood of success of existing and new RPS contracts.

Also, the new project viability tool should apply to all RPS-eligible projects, including WDG projects under other procurement programs, in terms of over-procurement requirements (not necessarily for bid ranking).

2. Flexible compliance rules

The Commission should ensure that flexible compliance rules for utilities are as stringent as possible, given the rather broad language in SB 2 (1X). SB 2 (1X) deleted SB 1078's flexible compliance provision (P.U. Code section 399.14(a)(2)(C)) and added the new sections 399.13(a)(4)(B) and 399.15(b)(5). Section 399.13(a)(4)(B) requires the Commission to create new rules for "permitting retail sellers to accumulate, beginning

January 1, 2011, excess procurement in one compliance period to be applied to any subsequent compliance period.” Section 399.15(b)(5) provides a number of circumstances that excuse a utility from complying with any particular compliance period, including inadequate transmission capacity, permitting issues and curtailment issues.

Circumstances beyond utility control should of course be permitted as legitimate reasons for non-compliance, but the utilities must demonstrate proactive mitigation efforts for any such circumstances. The Clean Coalition is very worried that the new compliance waiver rules (section 399.15(b)(5) in particular) are even more lenient than in SB 1078. This proceeding should establish strict standards for proactive mitigation of issues for any waiver of strict compliance, for example, insufficient transmission should be mitigated by higher procurement of DG in that area; interconnection issues should be mitigated by streamlining interconnection processes. Establishing proactive action criteria for any compliance waiver should be a focus of this proceeding. We shall submit more detailed comments on this and other RPS issues as the proceeding progresses.

1. Avoiding conflicts of interest for Utility-owned Generation (UOG)

With SB 2 (1X)’s explicit carveout for UOG, up to 8.25% of each utility’s load, and other legislative, financial and regulatory changes supporting UOG,² this proceeding should ensure that the appearance of conflict created by these changes doesn’t lead to actual conflict.

Utilities have an incentive to favor UOG projects given the new UOG allowances and more lenient flexible compliance provisions in SB 2 (1X). This creates an appearance of a conflict of interest. Having been involved deeply with utility-led interconnection rule changes at the CAISO and with utility WDATs over the last year, the Clean Coalition has gained the strong impression that third party projects face delays and barriers that are not always present for UOG projects.³ The Commission should, accordingly, create a stringent system for ensuring there is no actual conflict of interest between UOG programs and third party programs. The Commission should, as part of this effort, investigate previous UOG projects to ensure that third parties and UOG projects are

² For example, utilities only recently were granted the right to use federal tax credits for their own generation – a large additional incentive to develop UOG, on top of the normal rate-base incentive.

³ “UOG projects” does not here include unregulated subsidiary utility-owned projects (such as Edison’s Mission Energy), which as far as we can tell are subject to the same interconnection rules as third parties.

competing on a level playing field. The Commission should also ensure that UOG and third party procurement teams and procedures are completely distinct within each IOU and that UOG projects have no advantage over third parties.

2. Annual compliance reporting

With respect to annual compliance reporting (P.U. Code section 399.13(a)(3)), utility reporting on grid upgrades and interconnection should be detailed and publicly available (posted online).

3. Transmission and interconnection

The OIR suggests that transmission and interconnection issues needn't be considered in this proceeding. However, the reporting of grid upgrades and improvements to interconnection study procedures should be part of this proceeding, so that the linkages between grid planning, interconnection and procurement are fully considered. E.g. interconnection study costs and upgrade plans affect RPS cost limitations and SB 32 pricing determinations.

Moreover, SB 2 (1X)'s new 399.13(a)(2) requires utilities to submit to the Commission a report identifying any electrical transmission facility, upgrade, or enhancement that is reasonably necessary to achieve the renewables portfolio standard procurement requirements of this article. Accordingly, the Clean Coalition recommends that transmission and interconnection issues be considered in this proceeding where they directly impact other issues already determined to be within scope.

B. TREC Issues

We will address TREC issues in more detail later in this proceeding, but for now we note that our preference is to limit TRECs for RPS compliance more than the Commission has already done or SB 2 (1X) mandates. It is clear that we have more than enough in-state resources to meet the 33% by 2020 RPS – numerous studies have shown the enormous potential for solar power in our state. The huge response to recent utility renewable energy RFOs demonstrates that these previous projections are not just theoretical – particularly when it comes to solar power. Solar power has dropped dramatically in price and is now competitive with traditional resources, when judged

by the Market Price Referent (SCE's most recent Renewables Standard Contract included all solar projects, from 5-20 MW in size, all of which came in below the MPR). Accordingly, it seems clear that the rationale for allowing TRECs is diminishing as time passes. We don't advocate complete removal of TRECs from the RPS, but we do advocate a strong preference for in-state projects because of our abundant resources, the need for in-state job creation and other economic benefits that come from in-state projects. Regardless, we will be weighing in further on TREC issues, within the scope of SB 2 (1X) in this proceeding.

II. Initial Priorities

A. ALJ questions

The May 23 ALJ Ruling setting a date for a prehearing conference sets forth a number of questions for parties to answer (in italics below):

The party's three highest priorities among the principal topics identified in Attachment A to this ruling (or any other topic identified in this rulemaking that the party considers a high priority):

The Clean Coalition recommends the following prioritization:

1. SB 32 (section 399.20) implementation
2. Modify RPS procurement and compliance rules
3. Address TREC issues

The party's rough order of priority for the remaining topics:

We decline to comment at this time on this question.

A proposed schedule for addressing the identified three highest-priority topics:

1. The Clean Coalition strongly urges the Commission to issue an interim decision expanding the 1.5 megawatt feed-in tariff cap to 3 megawatts – as allowed pursuant to SB 32.

We have previously urged the Commission to use its inherent authority to put in place a 5 MW and smaller CLEAN program, using SB 32 as the model (Clean Coalition Opening Brief on SB 32), and we maintain this recommendation. We recognize that this 5 MW size limit is controversial given SB 32's three megawatt limitation and this is why we recommend now an interim decision expanding the limit from 1.5 MW to 3 MW, as well as resolving a number of relatively simple issues.

If the Commission issues an interim decision expanding the tariff to 3 MW, this program could be available within a few months because it would require only an interim decision and revised utility advice letters – as CEERT argued in their opening brief on SB 32.

Other issues that should be included in the interim decision:

- Leave pricing at MPR plus time of delivery under the 2009 MPR Resolution (we advocated in our opening brief on SB 32 a different pricing formula for the final decision, but MPR plus TOD should be sufficient, with a 3 MW cap, to get a number of projects going in 2011)
- Remove the requirement, under the current AB 1969 FIT, that the generator be an existing utility customer
- Fix the far too broad termination clause in SCE's AB 1969 CREST contract, which makes these projects unfinanceable⁴

The Clean Coalition also urges the Commission to proceed expeditiously in a final decision that addresses the numerous other issues raised by parties in opening and reply briefs submitted to the Commission earlier this year. Some of these issues are controversial so we have recommended that workshops be held to try and reach agreement among the parties and allow the Commission to come to its own conclusions. Our hope is that SB 32's expanded feed-in tariff program will be "open for business" in its final form before the end of the year.

⁴ Section 4.2 of SCE's CREST contract contains very broad termination authority:
http://asset.sce.com/Documents/Shared/100326_786_CRESTFullBuySell.pdf

2. Modify RPS procurement and compliance rules

We recommend that all RPS procurement and compliance rules be implemented before the end of the year.

3. Address TREC issues

Similarly, we recommend that all SB 2 (1X) TREC issues be resolved before the end of the year. TREC rules were established by the Commission in D.11-01-025 and will remain in force until December 31, 2011, so there is some time available to put in place the changes required by SB 2 (1X).

Whether, and if so, why, any of the party's three highest-priority topics may require evidentiary hearings:

The Clean Coalition doesn't at this time see the need for any hearings in this proceeding. Workshops should be sufficient to air concerns and allow the Commission to reach its conclusions.

Respectfully submitted,

TAM HUNT

A handwritten signature in black ink, consisting of several fluid, overlapping strokes that form the letters 'TAM HUNT'.

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Dated: May 31, 2011

VERIFICATION

I am an attorney for the Clean Coalition and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing pleading are true.

I declare under penalty of perjury that the foregoing is true and correct.
Executed this 31st day of May, 2011, at Santa Barbara, California.

Tam Hunt

A handwritten signature in black ink, appearing to read 'TH' followed by a long, sweeping horizontal stroke.

Clean Coalition

CERTIFICATE OF SERVICE

I hereby certify that I have served by electronic service a copy of the foregoing CLEAN COALITION OPENING COMMENTS ON ORDER INSTITUTING RULEMAKING on all known interested parties of record in R.11-05-005 included on the service list appended to the original document filed with this Commission. Service by first class U.S. mail has also been provided to those who have not provided an email address.

Dated at Santa Barbara, California, this 31st day of May, 2011.



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