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.10-05-006

ALTERNATIVE PROPOSAL OF SOUTHERN CALIFORNIA EDISON
COMPANY (U 338-E) IN RESPONSE TO THE ADMINISTRATIVE LAW JUDGE’S
INITIAL RULING IN RULEMAKING 10-05-006

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Dated:  June 11, 2010
In accordance with Ordering Paragraph Six of the May 28, 2010 Administrative Law Judge’s (ALJ) Initial Ruling on Procurement Planning Standards and Setting Schedule for Comments and Workshop (May 28 Ruling or Ruling), Southern California Edison Company (SCE) submits the following response.

I.

INTRODUCTION

The May 28 Ruling directs parties to file and serve “additional or alternative proposals,” but does not articulate clearly the intended breadth or scope of such proposals. The planning standards attached to the Ruling for resource plans (Attachment 2) and procurement plans (Attachment 4) are substantially narrowed and limited in their specificity in comparison to the July 2009 Energy Division Straw Proposal on LTPP Planning Standards (Straw Proposal) in Rulemaking (R.) 08-02-007, leaving unclear how California Public Utilities Commission (Commission) Staff intends to address the necessary implementation details associated with resource and procurement planning, and whether those details are intended to be resolved through subsequent Scoping Memos, or left to the investor-owned-utilities (IOU) to address as
part of their development of resource and procurement plans. This is particularly problematic with regard to procurement planning, which is only addressed to a limited degree in the Straw Proposal. To the extent the ALJ or Commission Staff intends to consider reliance on the Straw Proposal in this proceeding, SCE requests that its August 21, 2009 Opening Comments and August 31, 2009 Reply Comments on the Straw Proposal also be considered.

Finally, the amount of time provided for the development of alternative proposals—nine working days during a period when the parties are also developing and reviewing comments in response to the Order Instituting Rulemaking 10-05-006 (OIR), preparing for two June 11, 2010 workshops (one of which is to address the lengthy California Public Utilities Commission AB 57 AB 380 and SB 1078 Procurement Policy Manual that was attached to a separate June 2 ALJ Ruling) and preparing for a June 14, 2010 prehearing conference—is clearly inadequate. Thus, SCE’s efforts to respond herein to the request for alternative proposals should not be interpreted as reflecting the entirety of SCE’s suggestions for improving the conduct of this proceeding. SCE intends to actively participate in the workshops scheduled on June 11, 18, and 25, and reserves the right to offer additional and alternative proposals in post-workshop comments or at a later time as details of Staff’s plans for this proceeding are presented.

II.

DISCUSSION

A. Comments on Alternative Proposals for Track 1

1. SCE Continues to Support Energy Division Preparation of a System-Wide Policy-Oriented Resource Plan Analysis.

SCE fully supports the objectives of R.10-05-006 to comprehensively consider the impacts of state energy policies on the need for new resources. For numerous reasons, the analyses supporting this comprehensive study should not be conducted by the IOUs. Rather, Commission Staff should assume responsibility for conducting the system-wide resource
analyses. The three IOUs and other affected parties should work closely with Commission Staff to support this system-wide policy analysis, which would be conducted with the support of outside consultants hired by Commission Staff and funded by all customers, not just bundled customers. However, SCE would also support a process in which the IOUs perform a reasonably-scoped analysis at the direction of the Commission Staff, so long as the Commission Staff takes full responsibility for the underlying direction to the IOUs, and publishes the resulting work product as a Commission Staff document. All parties, including the IOUs, should be provided with an opportunity to comment on, and propose alternatives to, the Staff’s analyses and participate in hearings, if necessary.

This alternative proposal has the potential to achieve both the Energy Division’s objectives and SCE’s objectives through a transparent public process. The resulting Staff analyses will inform the Commission regarding the cumulative impact of all of its procurement policies and to that end, provide an integrated system-wide need sensitivity analysis under various policy approaches. The alternative of having separate plans has a likely outcome of not producing a statewide view, since results are not likely to be aggregable. This approach should also provide SCE with a reasonable opportunity to present its views on appropriate resource planning policies to the Commission, by allowing SCE (as well as all other interested parties) an opportunity to present a preferred resource plan as part of this proceeding.

The Commission Staff proposal described in Attachment 2 would require the IOUs and other participants to agree on an unprecedented level of detail regarding all inputs and assumptions that would go into the broad system-wide policy analysis. The last time such an approach was implemented in California was in the Biennial Resource Plan Update, which required very significant involvement and was universally recognized as a failure.

It is difficult to see how intervenor feedback can be easily incorporated into the IOUs’ analysis if there is significant disagreement with those inputs. Protracted disputes (including discovery and confidentiality issues) could derail the entire process. If Commission Staff are responsible for producing the system-wide policy analysis, they can solicit and incorporate
feedback, as they did with their 33% RPS Implementation Analysis conducted as part of R.08-02-007, and resolve conflicting comments efficiently on an ongoing basis.

Under this approach, Commission Staff may gather and take into account information that is proprietary and confidential.¹ For example, Staff could request information from Energy Service Providers (ESPs) regarding their portfolios and projected needs. On the other hand, if the IOUs conduct the analysis, the IOUs are unlikely to be empowered to obtain relevant confidential information from third parties or even from each other.

This approach has the added benefit of clearly delineating between the Commission Staff’s analyses of policies on a system-wide basis, and the IOUs’ procurement activities on behalf of bundled customers. Forcing the IOUs to conduct the system-wide policy analyses is likely to foster several false notions, including the misimpressions that the IOUs seek to usurp the planning functions of third parties, and that the IOUs alone are responsible for meeting the needs of the system and for acquiring resources needed to accomplish the State’s aggressive environmental goals. Again, those misimpressions are already evident in the comments filed by the parties on June 4.

2. **The Commission Should Not Exclude SCE’s Service Territory from the Scope of its Once-Through-Cooling (OTC) Analysis.**

The Ruling states that “planning for generation resources to support implementation of state polices on OTC mitigation is a primary focus of this (LTPP) proceeding.”² SCE strongly supports the Commission’s focus on OTC in this proceeding. The Ruling goes on to imply, however, that it will only conduct analyses to determine the need for new generation resources necessary to eliminate reliance on OTC in “the Greater Bay Area and San Diego local reliability areas, as well as plants located in northern California but not in local reliability areas.”

¹ If IOUs conduct the analysis on behalf of Commission Staff, it would be necessary to aggregate such data in order to protect confidentiality.
² Ruling, p. 7.
respect to SCE’s service territory, the Ruling only makes the statement that “analyses are also expected to begin the process of phasing out OTC in the Big Creek / Ventura and Los Angeles Basin local reliability areas.”

As stated in SCE’s comments on the OIR, the phase-out of OTC is a system design and system reliability issue, and needs to be addressed in the context of system resource plans as opposed to the IOUs’ bundled customer procurement plans. For SCE’s area in particular, with six plants totaling 6,870 MW, the plan to support implementation of state policies on OTC mitigation will require a thorough and comprehensive analysis. SCE is concerned that the path to resolving the OTC policy implementation for SCE's area was not sufficiently defined in the Ruling. This is particularly troubling because the State’s OTC policy specifically references this proceeding as the place where OTC policy implementation will be addressed.

3. **IOUs Should Conduct a Limited System Need Analysis to Inform Track 2.**

As an initial element of Track 1, SCE recommends that the three IOUs conduct a separate system-wide need analysis to assess near-term physical loads and resources balance. This analysis would not involve the broad policy analysis set forth in the Resource Planning Standards. Rather, this approach would consist of a high-level analysis, similar to that conducted by the IOUs in the 2006 Long Term Procurement Plan (LTPP) proceeding, for the specific purpose of assessing whether sufficient system resources are projected to exist to meet the Commission’s planning reserve margin. The three IOUs would incorporate the most recent available findings from studies such as the Renewable Energy Transmission Initiative (RETI), Energy Division’s 33% RPS Implementation Analysis, the CAISO’s ongoing renewable integration analysis, implementation of Senate Bill (SB) 695, the May 19, 2009 Joint Energy

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3 Ruling, p. 8.
4 SCE’s comments on OIR, p. 14.
5 In addition, the Los Angeles Department of Water and Power owns three OTC plants totaling 2,654 MW in the Los Angeles basin.
6 CSWRCB OTC Policy, Sections H and J.
Agency OTC proposal to the State Water Resources Control Board, and the 2009 IEPR and associated demand forecast in performing this high-level spreadsheet analysis. SCE proposes to have the IOUs work together to coordinate their system-need analyses to ensure consistency and comparability. All parties to this proceeding would have access to the model used by the IOUs to conduct the system need analysis, and should be provided with an opportunity to provide input to the Commission regarding the underlying assumptions. All parties should also be permitted to submit competing analysis/outlooks for the system-wide need. The process will provide an opportunity for interested parties to comment (and participate in hearings, if necessary) on the system-wide need.

Due to the severe recession that has impacted the California economy over the last several years, SCE does not anticipate that such an analysis will find a need for new resources in the near term due to demand growth, however, the system may need quick-start or peaking resources to address renewable intermittency. If a need for new system capacity is identified, the Commission will need to address the procurement policy for these resources and their associated cost recovery, or whether timing permits delaying a decision until the completion of Track 1 at the end of 2011.

B. Comments on Alternative Proposals for Track II

1. Clarification of the Role of Scenarios for Bundled Procurement Plans is Needed.

For resource planning purposes, scenarios represent possible future states of the world that encompass broadly varying assumptions about policy and possibly economic and environmental conditions. In this context, SCE concurs with the statement in Attachment 4 of the May 28 Ruling that “multiple scenarios will not be necessary in the bundled LTPPs, because

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Due to the significant impact of the demand forecast on the need for new resources, SCE recommends evaluating low, base case, and high demand forecasts, with the variations in these sensitivities reflecting both demand growth and demand-side management uncertainties.
resource policy choices will be considered in the system track.” Accordingly, the title on the bundled procurement tables in Attachment 3 regarding “Scenario: xx” requires clarification. Any such “scenarios” contemplated in bundled plans should be limited to consideration of the limits of procurement authority that are contingent on specific external factors. For example, SCE’s current bundled plan allows for different procurement limits based on the extent of direct access participation.

2. **Natural Gas Forecast Price Sensitivities Should Not Be Required.**

Currently, IOUs address the risk of natural gas price uncertainty in their bundled procurement activities by pursuing a forward hedging strategy consistent with the adopted Consumer Risk Tolerance (CRT). Table 7 of Attachment 4 proposes to conduct a sensitivity analysis of natural gas prices on the “base case portfolio” without considering the overlap between this requirement and how the utility bundled plan already incorporates natural gas price uncertainty mitigation. This particular sensitivity analysis is not needed and should be eliminated.

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8 May 28 Ruling, Attachment 4, p. 4.
III.

CONCLUSION

SCE looks forward to actively participating in the upcoming LTPP workshops later this month and will provide comments on issues and proposals addressed in these workshops as specified in the May 28 Ruling.

Respectfully submitted,

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June 11, 2010
CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission’s Rules of Practice and Procedure, I have this day served a true copy of ALTERNATIVE PROPOSAL OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) IN RESPONSE TO THE ADMINISTRATIVE LAW JUDGE’S INITIAL RULING IN RULEMAKING 10-05-006 on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this 11th day of June, 2010, at Rosemead, California.

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**State Service**

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