BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Integrate And Refine Procurement Policies Underlying Long-Term Procurement Plans.

(U 39-E)

R. 08-02-007
(Filed February 14, 2008)

PACIFIC GAS AND ELECTRIC COMPANY’S (U 39-E)
REPLY COMMENTS ON MRTU DEVELOPMENTS

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October 31, 2008
PACIFIC GAS AND ELECTRIC COMPANY’S (U 39-E)  
REPLY COMMENTS ON MRTU DEVELOPMENTS  

I. INTRODUCTION  

Pursuant to the August 28, 2008 Assigned Commissioner’s Ruling and Scoping Memo on the 2008 Long-Term Procurement Proceeding, Phase I (Scoping Memo), Pacific Gas and Electric Company (PG&E) provides these reply comments on developments relating to the California Independent System Operator’s (CAISO) Market Redesign and Technology Upgrade (MRTU). PG&E received opening proposals from San Diego Gas & Electric Company (SDG&E) and Southern California Edison Company (SCE). PG&E received October 24, 2008, comments on the utility proposals from the Alliance for Retail Energy Markets (AReM) and SCE.

These reply comments focus on SDG&E’s proposal to impose additional constraints on the CPUC-jurisdictional utilities’ abilities to retain Congestion Revenue Rights (CRRs), which is supported by AReM. SDG&E’s proposal has been rejected in previous forms by both the California Public Utilities Commission ("CPUC" or "Commission") and the Federal Energy Regulatory Commission (FERC). SDG&E’s proposal, which would disadvantage CPUC-jurisdictional entities vis a vis non-CPUC-jurisdictional entities in the FERC-regulated process of obtaining and retaining CRRs, is unneeded and the Commission should continue to reject it. In its October 24 comments SCE also urges the Commission to reject SDG&E’s proposal.
These reply comments also briefly address SDG&E’s recommendation, made with little analysis, that SDG&E’s authority to use virtual bidding be limited to 5 percent of its load. It is premature for the Commission to adopt any rules for utility participation in the CAISO virtual bidding markets at this time, given the substantial uncertainties about what some of the critical features of virtual bidding will be. As PG&E recommended in its opening comments, the Commission should address the issue of upfront and achievable standards for the utilities’ participation in virtual bidding once the CAISO Board has adopted a specific proposal.

Finally, these comments respond to SCE’s discussion of D.04-07-028. SCE notes that in D.04-07-028 the Commission directed the utilities to modify their procurement and scheduling practices to meet local area reliability needs. SCE argued that with the implementation of MRTU, which will by design develop feasible dispatch schedules in the day ahead market, the conditions that led to this aspect of D.04-07-028 are no longer applicable. PG&E agrees, and joins SCE in urging the Commission to find that implementation of MRTU will supersede this aspect of D.04-07-028.

II. DISCUSSION

A. The Commission Should Continue To Reject SDG&E’s Proposal To Limit The Utilities Ability To Retain CRRs

1. Both This Commission And FERC Have Already Rejected Similar SDG&E Proposals

In its October 3, 2008, proposal SDG&E recommends that the Commission limit the utilities’ ability to retain CRRs. Specifically, SDG&E recommends the following rule:

The Commission directs the IOUs not to seek indefinite renewal in the priority nomination process (PNP) tier for those Congestion Revenue Rights (CRRs) that were initially allocated to them because a CDWR contract was used to verify a source and thus justify a priority allocation in the Tier 1 and Tier 2 allocations of CRR Year 1. Instead, when the initial term of the underlying CDWR contract has expired, the relevant IOU must allow the associated CRRs to lapse in the PNP tier and be
returned to the pool of CRRs available to be nominated by all load serving entities in the post-PNP tiers. (SDG&E Proposal, p. 9.)

SDG&E acknowledges in its proposal that its primary concern, the ability for SDG&E to obtain CRRs based on 2006 procurement patterns and its ability to renew CRRs, is an issue it already raised at FERC, and that FERC rejected SDG&E's arguments. (See, SDG&E Proposal, pp. 8-9)

As SCE points out, SDG&E has already raised this issue at the Commission, as well, in connection with the Commission’s adoption of resolutions modifying the utilities’ procurement plans to authorize the utilities, subject to certain conditions, to procure long-term CRRs with terms of up to 10 years. (SCE Comments, pp. 3-5.) As did FERC, this Commission rejected SDG&E’s arguments. In Resolution E-4122, granting PG&E the ability to enter into long-term CRRs without pre-approval subject to certain conditions, the Commission stated:

The Commission finds that the additional restrictions that SDG&E requests be placed on PG&E’s CRR procurement activities may impose risk that could lead to negative consequences.

Both proposed restrictions are ill-advised because they would create discriminatory effects against the regulated utilities, creating a position of advantage for other market participants. The Commission believes it would be a poor policy to force utilities into a situation where they are systematically disadvantaged against other market participants because such a situation may result in increased costs for utility ratepayers.

Rather, the Commission shall rely on the criteria for implementation discussed in the body of this Resolution to ensure that SDG&E, PG&E and SCE seek to hedge actual expected grid use and do not engage in speculation. (Resolution E-4122, p. 12.)

Having lost at FERC and earlier at the Commission, SDG&E now seeks to re-litigate the issue yet again at the Commission. SDG&E has presented nothing new to justify a change to the Commission’s earlier conclusions. The Commission should continue to reject SDG&E’s request.
2. SDG&E’s Proposal Is Unnecessary And Benefits Other Market Participants At The Expense of CPUC-Jurisdictional Utilities

All three utilities have indicated that they intend to procure CRRs that correspond to their respective supply arrangements and load. Indeed, the approving resolutions that authorize the utilities’ participation in the CRR arena require this. (See, generally, Resolution E-4122.) Therefore, a utility will only use the priority nomination process to renew long-term CRRs it holds if those CRRs continue to correspond to the utility’s supply arrangements. No additional requirement is necessary to ensure that a utility will retain CRRs only if the CRRs relate to the utility’s supply arrangements.

SDG&E’s current proposal focuses on Department of Water Resources (DWR) contracts, which the Commission has allocated to the utilities for operational purposes. Other supply arrangements may replace DWR contracts as they expire. If they do not, the CRRs will be returned to the pool. Therefore, SDG&E’s proposal is not needed to ensure that utilities use the priority nomination process to retain only CRRs that can provide hedging benefits to their customers.

SDG&E’s proposed restrictions on retaining CRRs are limited to CPUC-jurisdictional utilities. However, the CPUC-jurisdictional utilities are not the only entities participating in the CRR processes and markets. Municipal entities, energy service providers, potential community choice aggregators and out-of-state entities, as well as other parties, will participate, as well. As the Commission noted in Resolution E-4122, cited above, to place SDG&E’s recommended constraint on just the CPUC-jurisdictional utilities is to harm their customers by putting them at a competitive disadvantage relative to other market participants. In effect, SDG&E’s rules will inappropriately “shrink the size of the CRR pie” for CPUC-jurisdictional utility customers. This result should be avoided. The Commission should continue to reject SDG&E’s proposal, which
would have the practical effect of disadvantaging CPUC-jurisdictional utilities in obtaining and retaining CRRs.

3. **SDG&E’s Comparisons To Resource Adequacy Imports And Path 26 Are Misplaced**

In its comments SDG&E argues that its proposal here is similar to something the Commission has endorsed with respect to resource adequacy (RA) imports and Path 26. (SDG&E Comments, pp. 13-15.)

SDG&E’s arguments have already been raised and rejected, and should be rejected again. The RA program as it relates to Path 26 only applies to Commission jurisdictional entities. CRRs are under FERC-jurisdictional CAISO Tariffs and apply to entities other than those under the Commission’s jurisdiction. While the Commission can impose conditions in the RA program and Path 26 that will apply to all participants in that program, applying conditions on the utilities will not affect all participants in the CRR allocation and may end up harming utility customers.

In sum, SDG&E’s recommended additional CRR constraint is unnecessary, would work against CPUC-jurisdictional utilities as a group, and has already been rejected in similar form by both this Commission and FERC. It should be rejected again.

B. **It Is Premature For The Commission To Adopt Any Guidelines Or Standards For Utility Participation In Virtual Bidding, When Substantial Components Of Virtual Bidding Markets Remain To Be Determined**

The CAISO is developing virtual bidding, also known as convergence bidding, as part of its Market and Performance (MAP) phase of MRTU, to be implemented one year after MRTU’s

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1/ SDG&E raised this argument in its challenge to draft Resolution E-4122, and PG&E addressed it in its response. ([Response of Pacific Gas and Electric Company to Comments of San Diego Gas and Electric Company on Draft Resolution E-4122, October 15, 2007, p. 5.](#)) The Commission rejected SDG&E’s proposal, but did not explicitly discuss SDG&E’s attempted analogy to the RA program and Path 26.
initial implementation. The CAISO continues to develop its convergence bidding proposal, and significant components remain unresolved.

For this reason, PG&E and SCE proposed that the Commission wait to determine upfront and achievable standards for the utilities’ participation in convergence bidding until a specific convergence bidding proposal has been approved by the CAISO board.

SDG&E takes a different tack, proposing that a specific limit for participation in virtual bidding be adopted at this time. “[U]ntil the product is created and a track record is established, SDG&E proposes that under its authority to use virtual bidding, its use would be limited to our current spot market authority (5%).” (SDG&E Proposal, p. 8.)

PG&E opposes SDG&E’s proposal. The upfront and achievable standards should be developed once the parameters of virtual bidding are known. They are not known now, and SDG&E has not offered any specific justification for its proposal. Since it is not possible to know the consequences of adopting any particular standard at this time, no standards should be adopted until more information is available.

C. The Commission’s Direction In D.04-07-028 For The Utilities To Modify Their Procurement And Scheduling Practices To Meet Local Area Reliability Needs Will Be Superseded By The Implementation Of MRTU

SCE noted in its proposal that in D.04-07-028 the Commission directed the utilities to modify their procurement and scheduling practices to meet local area reliability needs. (SCE Proposal, pp. 20-22.) SCE argues that with the implementation of MRTU, which will by design develop feasible dispatch schedules in the day ahead market, the conditions that led to this aspect of D.04-07-028 are no longer applicable. PG&E agrees, and joins SCE in urging the Commission to find that implementation of MRTU will supersede this aspect of D.04-07-028.
III. CONCLUSION

For the reasons set forth in its opening comments and these reply comments, Pacific Gas and Electric Company respectfully requests that

- the Commission not modify its currently adopted upfront and achievable standards for utility participation in the CRR process and markets;

- the Commission not adopt upfront and achievable standards for utility participation in virtual bidding at this time, but that instead the Commission address this once the CAISO board has adopted a specific virtual bidding program;

- the Commission reject SDG&E’s proposal to place additional constraints on the CPUC-jurisdictional utilities’ ability to use the priority nomination process to retain CRRs;

- the Commission reject SDG&E’s proposal to limit SDG&E’s participation in the virtual bidding markets to 5 percent of SDG&E’s load, that instead the Commission address this proposed standard in conjunction with others once the CAISO board has adopted a specific virtual bidding proposal; and

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- the Commission find that the implementation of MRTU will supersede D.04-07-028’s direction to the utilities to modify their procurement and scheduling practices to meet local area reliability needs.

Respectfully submitted,

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CERTIFICATE OF SERVICE BY ELECTRONIC MAIL OR U.S. MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is Pacific Gas and Electric Company, Law Department B30A, 77 Beale Street, San Francisco, CA 94105.

I am readily familiar with the business practice of Pacific Gas and Electric Company for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence is deposited with the United States Postal Service the same day it is submitted for mailing.

On the 31st day of October 2008, I caused to be served a true copy of:

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[XX]  By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service list for R. 08-02-007 with an e-mail address.

[XX]  By U.S. Mail – by placing the enclosed for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to those parties listed on the official service list for R. 08-02-007 without an e-mail address.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 31st day of October, 2008 at San Francisco, California.

/s/
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THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST
Downloaded October 31, 2008; Last updated on October 29, 2008
Commissioner Assigned: Michael R. Peevey on February 20, 2008
ALJ Assigned: Carol A. Brown on February 20, 2008

CPUC DOCKET NO. R0802007 CPUC REV 10-29-08
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