

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

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

R. 06-04-009

**COMMENTS OF THE WESTERN POWER TRADING FORUM
ON THE JOINT STAFF PROPOSAL FOR REPORTING OF
GREENHOUSE GAS EMISSIONS BY LOAD-SERVING ENTITIES**

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In accordance with the direction provided in the June 12, 2007 Ruling under Rulemaking 06-04-009, the Western Power Trading Forum ("WPTF") respectfully submits the following comments on the "Joint California Public Utilities Commission and California Energy Commission Staff Proposal for an Electricity Retail Provider GHG Reporting Protocol." Also, WPTF is concurrently filing these comments in the CEC's Docket 07-OIIP-01.

I. Introduction

WPTF has not taken a position on whether a load-based greenhouse gas (GHG) cap for the electric power sector, or the alternative 'first-seller' approach recommended by the Market Advisory Committee is preferable, and our comments should not be taken as an endorsement of either. However, as the Staff proposal is premised on the assumption that California will implement a load-based system, our comments are provided in that context.

In WPTF's view, the proposed reporting protocol would yield a reasonably accurate picture of both statewide and entity level emissions from the electric power sector either in the absence of GHG regulations, or under a source-based cap and trade system. However, under a load-based cap and trade system, the protocol provides the incentives and the means to enter wholesale power transactions to reduce assigned

emissions levels. Those transactions may give the appearance of emission reductions, without stimulating any actual reductions.

Further, WPTF believes that under a load-based system, the differences between assigned emission rates for specified power and unspecified power in the proposed protocol provide incentives that run contrary to ongoing efforts to improve the efficiency and reliability of California electricity markets.

For these reasons, WPTF does not consider the Staff reporting protocol appropriate for monitoring and enforcing compliance with a load-based emissions trading system. Detailed comments are provided below.

II. Comments

A. Treatment of unspecified power purchases

WPTF considers the Staff proposal's reliance on proxy emission rates for unspecified power to be especially problematic. The marginal dispatch analysis used to develop the emission factors appears to be methodologically sound and is probably accurate. However, the assignment of different emission factors for different power pools provides opportunities and incentives to enter transactions that undermine the efficient operation of electricity markets and which will reduce the accuracy of these emission rates over time.

For example, the Staff proposal would assign emission factors of 900 lbs/MWH for power purchased in the CAISO real-time market, and 1000 lbs/MWH for power purchased in the Integrated Forward Market (IFM). Instead of scheduling a resource in the IFM, the incentive exists to purchase the same power in the CAISO real-time market and therefore reduce the emissions attributed to each MWH by 100 lbs. In this way, the incentives created by the GHG limit run directly counter to the States' efforts to move power schedules out of the real-time market and into the forward market.

Second, the Staff proposal creates an opportunity to obscure high-emission generation behind proxy emission factors. Selling this power under unspecified contracts could save up to 1681 lbs/MWH of emissions (i.e. the difference between the emission rate of a coal-generator and the default emission rate of the Northwest Power Pool). The

ability to reduce assigned emissions will encourage high-emission generation to favor unspecified sales over unit-specific contracts.

Third, the difference between the default emission rates for the Northwest and Southwest Power Pools will encourage the scheduling of power for delivery through the Northwest interties, further congesting these lines. Although daily and seasonal patterns of imports and load conditions would likely constrain this practice, GHG regulations should not provide such an incentive.

B. Contract-shuffling

In response to concerns regarding the potential for contract shuffling, the Staff proposal states that the PUC and CEC would monitor the proportion of unspecified power in each retail provider's portfolio, as well as changes in aggregate patterns, during the early years of reporting, and investigate any perceived shifts. The proposal further states that cases of suspected contract shuffling would be responded to quickly, but does not indicate what such a response would be.

Under a load-based system, the compliance obligations will be on retail providers, but many of the "contract shuffling" activities, such as the examples provided under our comments on the treatment of unspecified power above, will be carried out by suppliers. Retail providers will not have knowledge of, or the ability to influence, these types of activities. Further, the suppliers who engage in these activities will not be subject to California regulatory jurisdiction. The Staff proposal to address contract shuffling by monitoring and educating retail providers is ineffective in addressing these types of activities.

With respect to specified power purchases, the Staff proposal suggests that claims to new contracts with low or zero emission power from existing plants should be treated with skepticism because such contracts are unlikely to induce additional generation. To address this, Staff proposes special conditions for new contracts with existing plants, such as limiting these claims to in-state resources or a demonstration that the contract was in place prior to a plant's construction. This proposed "additionality test" could interfere with normal contracting practices and prevent efforts by retail providers to reduce GHG emissions. This condition could also yield the absurd result that a contract that a retail

provider undertakes to meet the requirements of California's Emission Performance Standard could not be counted for compliance under a load-based trading system.

C. Exports

The Staff proposal does not provide sufficient discussion of the treatment of exported power under the reporting system. Staff seems to implicitly assume that, even under a load-based system, the California Air Resources Board will impose GHG restrictions on in-state generators that would prevent the generator from exporting emissions. Regardless of whether this is the case, PUC/CEC staff should address how responsibility for emissions from generators that export power will be distributed between California retail electricity providers and exports.

D. Internalization of the GHG price in dispatch decision

Although WPTF does not take a position on the load-based or first seller approaches, GHG regulation will be most effective and least disruptive of wholesale electricity markets if the price of GHG emissions is captured at the generator level and reflected in the subsequent dispatch decision. The staff proposal provides no discussion of this important issue and it is not clear to WPTF that it has been considered. We recommend PUC/CEC staff specifically consider whether its proposed approach injects the cost of GHG emissions into dispatch decisions, and address this in its response.

E. Reporting and Tracking

The Staff proposal would require all retail electricity providers to annually report all wholesale purchases from specified purchases. For an out-of-state plant, retail providers would also be required to report the plant's net generation, fuel-consumption data, emission and oxidation factors and greenhouse gas emissions. This requirement creates unnecessary administrative burden for merchant generators, and is duplicative of information already reported to the Federal Energy Regulatory Commission, the Energy Information Administration and the Environmental Protection Agency. Further, changes in wholesale power transactions will render proxy emission factors inaccurate over time, and necessitate their frequent revision.

III. Conclusion

WPTF appreciates this opportunity to comment and the Commission's consideration of the comments listed herein. Finally, WPTF recommends that the PUC and CEC further explore the use of WREGIS to track GHG emissions associated with electric power generation, and to coordinate its efforts with other Western States. It is imperative that California's GHG emission regulations for the electricity sector are compatible and consistent with future regional and federal efforts.

Respectfully submitted,

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July 2, 2007

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing document on all parties of record in the above captioned proceedings by serving an electronic copy on their email addresses of record and, for those parties without an email address of record, by mailing a properly addressed copy by first-class mail with postage prepaid to each party on the Commission's official service list for this proceeding.

This Certificate of Service is executed on July 2, 2007, at Woodland Hills, California.

CALIFORNIA PUBLIC UTILITIES COMMISSION

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