

**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)
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**REPLY COMMENTS OF MORGAN STANLEY CAPITAL GROUP INC.  
ON JOINT CALIFORNIA PUBLIC UTILITIES COMMISSION AND  
CALIFORNIA ENERGY COMMISSION STAFF PROPOSAL FOR AN  
ELECTRIC RETAIL PROVIDER GHG REPORTING PROTOCOL**

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July 10, 2007

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**I. INTRODUCTION**

Pursuant to the June 12, 2007 ruling of Administrative Law Judges Charlotte F. TerKeust and Jonathan Lakritz, Morgan Stanley Capital Group Inc. (“MSCG”) respectfully submits its reply comments on the Joint California Public Utilities Commission and California Energy Commission Staff Proposal for an Electric Retail Provider GHG Reporting Protocol (“Joint Proposal”).<sup>1</sup> Specifically, MSCG’s reply comments focus on the issues raised by Calpine Corporation (“Calpine”) regarding contracting with unspecified sources.

**II. REPLY COMMENTS**

In commenting on the Joint Proposal, Calpine observes that establishing default emissions profiles from different regions creates some incentives for behavioral changes to take advantage of the default emissions rates. As a significant part of its proposed solution, Calpine recommends seeking ways to minimize the ability of load serving entities (“LSE”) to contract with unspecified sources, although it recognizes that some degree of unspecified source contracting will remain necessary for the California grid to function. MSCG respectfully disagrees with Calpine, both with regard to the desirability of seeking to minimize unspecified

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<sup>1</sup> See Administrative Law Judges’ Ruling Regarding Comments on Staff Reporting Proposal, *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) (issued June 12, 2007).

source contracting, and with regard to the effectiveness of contracting with specified sources in addressing the issues identified.

First, the possibilities for behavior adjustments were not unknown, and there is no reason to assume that the possibility was not contemplated by Staff in its analysis, even if the behaviors that Calpine speculates might occur were not specifically identified in the Joint Proposal. While no one would state that such substitutions cannot happen, the underpinning assumption of the whole marginal dispatch proposal is that they will not because such “dirty” resources will have already been overwhelmingly committed to their home markets. Calpine provides no argument as to why this underlying fundamental assumption is misguided. Therefore, the concern, while legitimate, seems greatly overstated.

Second, Calpine’s proposed solution – contracts with specified sources – would not necessarily address the concern. Indeed, Calpine’s proposed reliance on specified source contracts would just shift the concern to another well-known problem: contract shuffling. More specifically, although contracting with a specified source would probably ensure that the resource injects power onto the grid, it would not ensure that the contracted-for power would flow to California customers or that “contract shuffling” would not occur. Specified source contracting, therefore, is not fundamentally different from a REC-like emissions tracking regimen, in that contracting with a specified source only establishes rights to “claim” the emissions profile for reporting and compliance purposes. These same goals could be accomplished by developing a WREGIS-like system for tracking financial ownership of the emissions profile, rather than trying to maximize unit-specific contracting.<sup>2</sup>

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<sup>2</sup> Although MSCG has pointed out that development of a WREGIS-like tracking system would be functionally equivalent to a specified source contract, this should not be taken as an endorsement of WREGIS-like approaches

(continued...)

Third, Calpine posits that specifying sources is the best way to ensure that emissions goals are met.<sup>3</sup> However, limiting the ability of LSEs to rely on contracts involving unspecified sources would reduce greatly the ability of the collective electric system to optimize dispatch in real time, thereby imposing unneeded compliance costs on consumers.<sup>4</sup> Accordingly, the Commission should avoid proposals that would have the effect of impeding the ability of LSEs to enter into contracts involving unspecified sources.

Fourth, Calpine's proposal could have unintended reliability consequences. Calpine contends that sellers would sell power as "unspecified," masking the power source behind a contract in order to benefit from the emissions proxies proposed for unspecified sources. In Calpine's view, increasing the emission proxies for unspecified sources to match those applicable to high-emissions units would limit the benefits of masking and encourage LSEs to enter into contracts where power is supplied from low-emissions units. While the proposed solution would certainly reduce the incentive to mask resources behind unspecified source contracts, it is questionable, at best, whether it would actually do anything to change the dispatch and lower aggregate emissions due to the resource pre-emption assumptions discussed above, and the ability to engage in contract shuffling. On the other hand, increased specified source contracting is likely to come at a real cost to system reliability because such contracts would be unit-contingent. The inability to rely on a supplier to make necessary adjustments for resource outages just pushes that

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*per se*. While they have merit and potential to be components of the overall system, such approaches have their own drawbacks and problems, as discussed by MSCG and others in initial comments and public forums.

<sup>3</sup> Calpine Comments at 3.

<sup>4</sup> Similarly, LSE power procurement from unspecified sources is not inconsistent with long-term GHG reduction goals nor does it violate the Legislature's mandate that California account for GHG emissions. Thus, MSCG reiterates its support for the Joint Proposal's suggestion that California avoid restrictions on the right to free contract and the potential to add unneeded costs to consumers by removing optionality in dispatch.

burden onto either the LSE or the system operator (*e.g.*, the CAISO). More real-time adjustments would be required, and the amount of energy procured via imbalance energy markets in real time would increase. Conversely, if the unit-contingent contract supplier is allowed or required to replace energy from a unit on outage, then the contract becomes a *de facto* unspecified source contract. Consequently, California should avoid designing a system that discourages reliance on unspecified sources because of the potential detrimental impact on reliability.

In conclusion, reiterating the point MSCG made in its initial comments, it is likely that there are certain insoluble dilemmas that come with trying to impose a closed system regulatory regime on an open system. Within the context of the closed system/open system problem, the goal of minimizing contract shuffling cannot be achieved by restricting an LSE's ability to contract with unspecified sources. An LSE can control its own contracting activities, but it cannot control what resource owners do with capacity or output not contracted to that LSE. Thus, the approach proposed by Calpine would not achieve its objective.

### **III. CONCLUSION**

MSCG respectfully requests that the Commission consider the foregoing reply comments in its consideration of the Joint Proposal.

Respectfully submitted,

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/s/

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July 10, 2007  
WDC99 1421182-7.043920.0236

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## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Reply Comments On Joint California Public Utilities Commission And California Energy Commission Staff Proposal For An Electric Retail Provider GHG Reporting Protocol Of Morgan Stanley Capital Group Inc. on all of parties of record in R. 06-04-009 by electronic mail and by U.S. mail to those parties who have not provided an electronic address to the Commission. I also have sent hard copies by overnight mail to the assigned Commissioner, Michael R. Peevy, and the assigned Administrative Law Judges, Charlotte F. TerKeurst and Jonathan Lakritz.

Moreover, pursuant to the June 12, 2007 Administrative Law Judges' Ruling Regarding Comments On Staff Reporting Proposal issued in R. 06-04-009, I have sent one hard copy of these reply comments by overnight mail to the California Energy Commission and also have sent electronic copies of these comments to [doCKET@energy.state.ca.us](mailto:doCKET@energy.state.ca.us) and [kgriffin@energy.state.ca.us](mailto:kgriffin@energy.state.ca.us).

Dated at Washington, DC, this 10th day of July, 2007.

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/s/  
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