BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the
Commission’s Own Motion into combined heat and power Pursuant to Assembly Bill 1613.

Rulemaking 08-06-024
(Filed June 26, 2008)

RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO ORDER INSTITUTING RULEMAKING ON COMBINED HEAT AND POWER SYSTEMS

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Dated:  July 31, 2008
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Pursuant to Ordering Paragraph 8 of the Order Instituting Rulemaking, R.08-06-024, issued July 1, 2008 (OIR), and Rule 6.2 of the California Public Utilities Commission’s (Commission or CPUC) Rules of Practice and Procedure, Southern California Edison Company (SCE) hereby submits its comments on the OIR to implement the provisions of Assembly Bill 1613 (AB 1613) to establish policies and procedures for purchase of electricity from new combined heat and power (CHP) systems, as that term is defined in Public Utilities Code Section 2840.2(a).

SCE concurs with the scope of the proceeding set forth in the OIR. SCE responds to the questions in Section 4 of the OIR, but SCE does not provide a “pay-as-you-save” pilot program proposal in these comments. SCE and the other Investor-Owned Utilities (IOUs) need to address significant legal and regulatory issues associated with required on-bill financing for that pilot program before providing a proposal.
I. SUMMARY OF SCE’S POSITION

AB 1613 has straightforward requirements for development of policies and procedures for the purchase of energy from CHP systems. The OIR clearly identifies key policies requiring Commission action. Specifically, the Commission must establish that:

- IOUs “purchase excess electricity delivered by a new CHP system of not more than 20 MW;”¹

- The new CHP system must: (1) use waste heat to create electricity; (2) be sized to meet the customer/generator’s thermal load; (3) operate continuously to meet expected thermal load and optimize efficient use of waste heat; and (4) be cost-effective, technologically feasible, and environmentally beneficial.²

- The new CHP system must meet a 60% efficiency standard taking into account Nitrogen Oxide (NOx) emissions limitations;³

- The new CHP system must meet greenhouse gas (GHG) emission performance standards limiting emissions to no greater than combined cycle gas turbines (CCGTs) with best available control technology (BACT);⁴

- The new CHP system must continue to meet maintenance requirements to assure energy efficient operation;⁵ and

- Non profit organizations can participate in a “pay-as-you-save” pilot program financing all up front costs for purchase and installation of new CHP systems.

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¹ OIR, p. 2.
² AB 1613, Public Utilities Code §2843(a)(1)-(4).
³ AB 1613, Public Utilities Code §2843(e)(1).
⁴ See AB 1613, Public Utilities Code §2843(f), and Public Utilities Code §8341.
⁵ AB 1613, Public Utilities Code §2843(g).
The OIR identifies the appropriate scope of the proceeding in Section 4. That being said, the “pay-as-you-save” pilot program raises significant legal and regulatory issues associated with required on-bill financing. The primary impediment is the issue of how SCE, as a utility and not a lending institution, can implement on-bill financing consistent with existing lending laws.

II.

SCE’S RESPONSES TO OIR QUESTIONS

A. To What Extent Can The Current Policies And Provisions Adopted For Small QFs In D.07-09-040 Be Extended To CHP Systems?

D.07-09-040 is the CPUC’s most instructive policy statement on the issue of appropriate pricing for energy provided by CHP systems. The current policy of using avoided cost to compensate small Qualifying Facilities (QFs) for electricity provided to IOUs in D.07-09-040 and other avoided cost decisions should extend to new CHP systems. There is no reason for the Commission to deviate from the long-held position of pricing energy from CHP systems at avoided costs. Use of avoided cost pricing will maintain equity between small and large CHP systems.

D.07-09-040 may also be instructive on standard contracting terms and conditions. To the extent that the Commission can leverage the extensive work done in development in D.07-09-040 on standard contracts for small QFs and apply it to the new CHP systems, SCE supports that effort. However, any effort to standardize the contracts for small QFs and AB 1613 systems must account for the fact that AB 1613 imposes different requirements from those implemented for small QFs in D.07-09-040. Consequently, certain terms and conditions on matters such as efficiency and maintenance requirements will necessarily be different.

6 OIR, p. 6.

7 SCE has filed an application for rehearing regarding the Commission’s estimation of avoided cost, in which SCE references the record to demonstrate these costs are too high.

Yes. There should be a kilowatt-hour (kWh) limit on the amount of excess electricity that utilities are required to purchase. AB 1613 provides that “The commission may establish a maximum [kWh] limitation on the amount of excess electricity that an electrical corporation is required to purchase if the commission finds that the anticipated excess electricity generated has an adverse effect on long-term resource planning or reliable operation of the grid.” Given impending changes governing the use and supply of electricity in California discussed further below, only setting a kWh limit on IOU obligations can avoid such an impact.

One possible change to California’s electricity markets is the possible reopening of direct access, which is currently under consideration in R.07-05-025. The reopening of direct access and a corresponding change in the utilities’ loads would have a significant impact on SCE’s resource requirements. It would also certainly change the IOUs’ views on the need for and value of all contracts, including CHP systems contemplated under AB 1613. Any increase to the renewable portfolio standard goals would also affect resource requirements. Greater emphasis on renewable resource procurement would affect the value, from a resource planning perspective, of CHP systems contemplated by AB 1613. If SCE and its customers do not have a need for excess electricity, the Commission should not require SCE to take it.

The Commission can control the effects of additional CHP on resource planning and reliable grid operations by implementing AB 1613’s intent that an eligible CHP System be “sized to meet the eligible customer-generator’s onsite thermal demand” and be designed to capture waste heat that is already being produced, but not captured. Enforcement of these requirements would minimize the excess electricity from CHP systems that are purposely designed to take advantage of standard offer contracts offered under AB 1613.

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8 See R.07-05-025, considering reopening of Direct Access.
At Public Utilities Code Section 2843(a)(1), AB 1613 requires the California Energy Commission to establish guidelines for CHP systems that accomplish, among other things, the following: "Reduce waste heat" In SCE's view, this indicates a strong preference for CHP systems specifically designed to capture waste heat that is already being produced but not captured. Likewise, in SCE's view, the Legislature did not intend to spur the creation of new CHP systems designed primarily to create waste heat so that it can be used to produce electricity. In SCE's view, the Commission's implementation of AB 1613 should not encourage development of wasteful simple cycle gas turbines, microturbines, or internal combustion engines like occurred as a result of the low standards of PURPA.9

Statutory language also shows that the Legislature did not intend AB 1613 to allow customers to size their CHP systems to meet a small thermal need with deliberate oversizing of the system’s electrical portion to sell electricity to the IOUs. AB 1613, at Public Utilities Code §2843(b), indicates that the purpose of AB 1613 is not to provide de facto wholesale generators with guaranteed purchasers for their electricity:

It is the intent of the Legislature that the guidelines do not permit customers to operate as de facto wholesale generators with guaranteed purchasers for their electricity.

While CHP systems cannot be perfectly matched to serve both the electrical and thermal needs of a facility (a circumstance that results in incremental excess), the terms and conditions of any CHP standard contract should follow AB 1613’s intent of encouraging the more efficient generation of electricity by capturing unused waste heat and using it to offset a facility’s electric demand. As a result, the Commission should not require SCE to take excess electricity from new CHP systems that are either designed primarily to create waste heat to be used to produce electricity or oversized on the electrical portion simply to sell excess electricity.

9 The Public Utility Regulatory Policies Act (PURPA) of 1978, codified at 16 U.S.C. §§ 2601-2645, created a market for non-utility electric power producers forcing electric utilities to buy power from these producers at the "avoided cost" rate, which was the cost the electric utility would incur were it to generate or purchase from another source.

Yes. The standard contract in development for small QFs in D.07-09-040 can form the basis of a standard contract for new CHP systems modified to include terms to meet all AB 1613 statutory requirements including, for example, efficient operation, GHG reduction, cost-effectiveness, and maintenance of the facilities. These standard offer contracts must also correspond with the term of 10 years or less required by AB 1613 and meet the performance requirements outlined in AB 1613. In addition, contracts for “pay-as-you-save” pilot program participants must outline the applicable credit and collateral standards.

D. Can And Should The Tariffs For Small QFs Be Extended To CHP Systems? Why Or Why Not?

There seems to be no difference between Questions III.C and III.D. A modified version of the standard offer contract can satisfy the provisions of AB 1613 for new CHP systems.

E. Does The Provision In D.07-12-052 That Any Changes In QF Development And/Or Re-Contracting Policy The Utilities Experience And Anticipate Be Addressed In Utility LTPP Filings Satisfy The Requirements Of Section 2842?

Yes.

F. Should A Repowered CHP Facility Meeting The Requirements Of Section 2840.2(a) Be Considered A “New” CHP System?

A repowered CHP facility meeting AB 1613 efficiency, GHG reduction, cost-effectiveness, and performance requirements should meet the Section 2840.2(a) requirements for a “new” CHP system.
III.

SCE HAS SIGNIFICANT CONCERNS ABOUT ITS ABILITY TO QUICKLY IMPLEMENT THE “PAY-AS-YOU-SAVE” PILOT PROGRAM

AB 1613 requires the Commission to establish a “pay-as-you-save” pilot program for non-profit organizations. This mandate raises two issues: (1) the requirement for on-bill financing will require seeking guidance from the Department of Corporations to assure that the pilot program does not result in SCE becoming a finance lender or broker and (2) the need to assure that pilot program customers pay all costs of the program.

First, the pilot program must enable eligible non-profit customers “to finance all of the upfront costs for the purchase and installation of a combined heat and power system by repaying those costs over time through on-bill financing at the difference between what an eligible customer would have paid for electricity and the actual savings derived for a period of up to 10 years.” \(^\text{10}\) This requirement creates interesting legal issues that the Commission must address before implementing the pilot program. The primary legal issue connected to any on-bill financing program is the extent to which an electrical corporation can function as a lending institution without running afoul of state and federal lending laws.

The IOUs faced this problem before in connection with the implementation of an on-bill financing program for energy efficiency programs established in D.05-09-049. In that case, the Sempra Utilities requested guidance from the California Department of Corporations concerning implementation of on-bill financing. On July 14, 2006, the California Department of Corporations issued Release No. 60-FS, which found that the IOUs are not engaged in the business of a finance lender or broker under certain circumstances.

The circumstances of the on bill financing program for the energy efficiency programs included:

\[^{10}\] AB 1613, Public Utilities Code §2842.4(c).
Lenders (utilities):

- Include only public utilities (electrical and gas).
- Operate under the California Public Utilities Code, subject to CPUC regulation.
- Make loans in accordance with financing programs approved by the CPUC.
- Administer financing programs in a manner that is merely ancillary to their business of providing energy.
- Comply with all applicable federal and state laws with respect to any loans made under the financing programs.

Borrowers:

- Include only commercial, nonresidential customers of the public utility, including government agencies and owners of residential multi-family units who do not live on the premises.
- Must be customers in good credit standing with the public utility, as determined by eligibility criteria set forth in the financing programs of public utilities.
- Complete loan applications and sign loan contracts pursuant to the financing programs.
- Accept responsibility for purchasing and installing Energy Efficiency Equipment.

Loans:

- Must be made to borrowers solely for the purpose of purchasing and/or installing Energy Efficiency Equipment.
- Fall within the definition of commercial loan in Financial Code Section 22502 and are therefore not used for personal, family or household purposes [Section 22502 states: “‘Commercial Loan’ means a loan of a principal amount of five thousand dollars ($5,000) or more, or any loan under an open-end credit program . . .”]
• Impose no costs on the borrower because the loans are provided free of any interest, fees, late payment penalties, and other charges. ¹¹

The “pay-as-you-save” pilot program would not meet the requirements set forth for the energy efficiency program discussed in Release No. 60-FS because that Release dealt only with loans made to install energy efficiency equipment. CHP systems are not energy efficiency equipment. As a result, the affected electrical corporations would require similar guidance from the California Department of Corporations before proceeding with a “pay-as-you-save” pilot program. Accordingly, the Commission should not order the IOUs to institute “pay-as-you-save” pilot programs until the California Department of Corporations provides sufficient guidance.

Additionally, the Commission and the IOUs will need to address a number of other complex issues such as:

• The interest rate to be applied to the loan;
• Whether the loans are secured or unsecured;
• If secured, what form of security the load should take;
• Determine the appropriate credit and insurance requirements to protect ratepayers;
• What happens in the event of default?
• The possibility of default reflects a potential cost to ratepayers, yet the statute states that the CHP generators will bear all of the costs of the pilot program. Does this mean that lending costs or risks must be spread to all participants through a separate charge?
• In the event of default, can the IOU take ownership of a CHP system? Once the IOU takes ownership, what will its rights and obligations be? and

Second, Public Utilities Code §2842.4(e) requires that the non profit organizations purchasing and installing CHP generators bear all costs of the “pay-as-you-save” pilot

¹¹ Department of Corporations Release Number 60-FS.
The IOUs must perform a careful analysis of all costs likely to be associated with the pilot program. In addition, the IOUs must develop ratemaking mechanisms to assure that no customers, other than pilot program customers, bear these costs. Consideration of this issue will require careful deliberation and collaboration with all stakeholders.

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12 “All costs of the pay-as-you-save program or financing mechanisms shall be borne solely by the combined heat and power generators that use the program or financing mechanisms, and the commission shall ensure that the costs of the program are not shifted to the other customers or classes or customers of the electrical corporation.” AB 1613; Public Utilities Code §2842.4(e).
IV.

CONCLUSION

For all of the reasons stated above, SCE urges the Commission to: (1) adopt the scope of the proceedings set forth in the OIR, (2) move forward with implementation of AB 1613 in accordance with SCE’s responses to the questions in the OIR, and (3) provide sufficient time to the IOUs for development of the required “pay-as-you-save” pilot program consistent with lending laws and AB 1613.

Respectfully submitted,

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July 31, 2008

1556476
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 RESPONSE OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO ORDER INSTITUTING RULEMAKING ON COMBINED HEAT AND POWER SYSTEMS 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 31st day of July 2008, at Rosemead, California.

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