BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Annual Local and Flexible Procurement Obligations for the 2019 and 2020 Compliance Years.

Rulemaking 17-09-020

REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON PROPOSED DECISION REFINING THE RESOURCE ADEQUACY PROGRAM

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Dated: December 17, 2018
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I. SCE’S REPLY COMMENTS

A. The Procurement of Dispatch Rights Should Not be Mandatory and Dispatch Rights Should Not Be Sold Through an Auction

In the PD, the Commission “require[s] the central buyers to include dispatch rights in their solicitations, as an optional term that bidders are encouraged to include” and “strongly encourage[s] the central buyers to procure dispatch rights…whenever doing so is in the financial interest of all ratepayers…. ”¹ In their comments on the PD, the Center for Energy Efficiency and Renewable Technologies (“CEERT”) recommends that the central buyer be required to procure dispatch rights.² It is not prudent to presume that the best interest of ratepayers will always be

¹ PD at 38.
² CEERT Comments, Appendix A proposed edits to Finding of Fact (“FOF”) 15, Conclusion of Law (“COL”) 10 and Ordering Paragraph (“OP”) 7(f).
served by the central buyer acquiring dispatch rights within its solicitation. Such a requirement would further exacerbate the debt-equity issues discussed further in the PD while not clearly possessing offsetting benefit. As such, the PD correctly affords the central buyer discretion in the procurement of dispatch rights and the modifications proposed by CEERT should be rejected.

In comments from the Department of Market Monitoring (“DMM”) of the California Independent System Operator (“CAISO”), DMM suggests that the central buyers utilize an auction to sell the dispatch rights associated with any centrally procured resource for which dispatch rights are obtained. SCE is concerned that such a process would add to costs and complexity with no clear benefit. SCE has conducted such auctions in the past and they have generally seen a lack of participation. In addition, since the central buyer is required to bid under a Least-Cost Dispatch (“LCD”) protocol, the incentives for appropriately bidding resources noted by DMM are largely addressed. Based on a brief discussion with DMM, it is evident that their concern about incentives and the ability of LCD is primarily around the ability to bid the complex marginal cost of a battery storage device under such a protocol. While SCE appreciates this concern, SCE believes that such costs can be calculated and that any improvements necessary to appropriately reflect such costs should be addressed through a market design initiative at the CAISO as necessary. Given the relatively small amount of battery storage in local areas presently, this issue can be addressed at a later date without modification to the PD.

B. It is Not Likely That Central Procurement Will Be the Process That Brings New Resources Online

DMM and the California Energy Storage Alliance (“CESA”) raise issues related to the intersection of central procurement and the development of new resources. DMM states “it is not clear how entities will be incentivized to build and contract for new generation needed for local reliability, what entities will be responsible for contracting for new generation, and how

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3 DMM Comments at 3.
contract costs and attributes will impact LSEs.”⁴ CESA states “the ‘loading order concept’ expressed in SB 1136 should be explicitly addressed in the PD, including how the Commission should ‘facilitate development of new generating, non-generating, and hybrid capacity….‘”⁵ SCE does not agree that central procurement will be the process that brings new generating resources online. First, the tenure of a three-year contract is not likely to provide sufficient revenue assurance to build a new resource. Second, the cost of new entry is likely to be well above that of other RA available to serve the local need, which makes its procurement more appropriate for long-term planning processes to weigh the benefits of such a resource in meeting policy objectives compared to the costs of doing so. As such, it will continue to be the planning process that develops new generating resources. Those resources can then provide local RA (if in the local area). For resources developed for local capacity requirements (“LCR”) purposes, the resource will likely be a Cost Allocation Mechanism (“CAM”) allocated resource, and as such, will serve to reduce the amount of central procurement to be performed.

C. Renewable Resources and Distributed Energy Resources Will Continue to Be Utilized Under a Central Buyer

Sunrun Inc. (“Sunrun”) and the California Community Choice Association (“CalCCA”) argue that the use of a central buyer will reduce the use and/or reduce the incentives to procure renewable resources and distributed energy resources (“DERs”) in the local areas.⁶ SCE believes that such resources will continue to have value to all load-serving entities (“LSEs”) in meeting various needs, including their customers’ desires as well as State policy mandates. Therefore, LSEs will continue to seek such resources to meet energy needs associated with the specific type of resource. The capacity value of Local RA within such a contract can be monetized by offering such a resource to the central buyer.

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⁴ DMM Comments at 2.
⁵ CESA Comments at 10.
⁶ Sunrun Comments at 3-4; CalCCA Comments at 2.
In addition, as stated previously, the development of new resources, including DERs and renewable resources will be performed through planning processes such as the Integrated Resource Planning proceeding. SCE notes that it has procured Preferred Resources as required by the Commission in planning proceedings, for example, the procurement of LCR resources in both the Moorpark and Western LA Basin through the Long Term Procurement Plan proceeding.

D. Recovery of Credit Costs

SCE agrees with Pacific Gas and Electric Company (“PG&E”) and San Diego Gas & Electric Company (“SDG&E”) that further discussion of the recovery of credit costs driven by the role of central buyer may be necessary. The thorough evaluation of the impacts to the investor-owned utilities (“IOUs”) credit costs will be best evaluated and addressed as necessary in the IOUs’ Cost of Capital proceedings. Should it become necessary to make such adjustments, SCE would make such a proposal within that proceeding.

E. Cost Allocation Will Be Necessary Regardless of Who Serves as the Central Buyer

In their comments, Diamond Generating Corporation and Sentinel Energy (“DGC/Sentinel”) remove all reference to CAM in regard to allocating the costs of centrally procured local RA in their suggested edits to the Findings of Fact, Conclusions of Law, and an Ordering Paragraph in the PD. While SCE understands the primary objective of this revision is the position of DGC/Sentinel that the IOUs should not serve as the central buyers, DGC/Sentinel does recommend that a “single/independent entity” will perform central procurement, therefore, it is not sufficient to simply remove all reference to cost allocation. As SCE stated in its testimony, “[a] framework with equitable cost allocation” is fundamental to establishing a sustainable central procurement program even if over a limited time. Therefore, simply

2 PG&E Comments at 7-8; SDG&E Comments at 4-6.
3 Diamond Generating Corporation and Sentinel Energy Center Comments, Appendix A, FOF 22, COL 14 and OP 11.
4 SCE’s Track 2 Testimony, dated July 10, 2018, at 10-12.
eliminating any reference to cost allocation is inappropriate under any program that would utilize a central buyer, and the Commission should reject DGC/Sentinel’s proposed modifications.

F. Applicability of Penalties for Failing to Meet the Local RA Requirement

CPower, Enel X North America, Inc., and EnergyHub (the “Joint DR Parties”) recommend that the central buyer should not be allowed to defer procurement without the imposition of the Commission’s RA penalties.10 SCE does not agree with this position. The removal of the penalty for the central buyer was in recognition of the fact that market power may drive prices higher than the cost of backstop procurement by the CAISO that would be allocated to CAISO load. Since the central buyers do not have the same Federal Energy Regulatory Commission (“FERC”) protections that the CAISO does to avoid market power, the ability to defer procurement to the CAISO without penalty was a logical decision by the Commission. Further, if such penalties are imposed, then it must be decided what happens to those penalties. If they are allocated via CAM, then the penalty simply increases the costs for all benefitting customers. If on the other hand, the penalty is applied to the shareholders of the central procurement entity, the mechanism would be inappropriate as those same shareholders do not benefit from the central procurement role of the IOU. In order to retain the necessary market power mitigation and to avoid illogical outcomes from the imposition of a penalty, the Commission should reject the Joint DR Parties’ recommendation.

II. CONCLUSION

SCE continues to support the PD and respectfully requests that the Commission adopt the modifications proposed in SCE’s opening comments on the PD. SCE appreciates the opportunity to provide reply comments on the PD and asks that the Commission consider these reply comments in its final decision.

10 Joint DR Parties Comments at 10.
Respectfully submitted,

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and 2020 Compliance Years.

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 the REPLY COMMENTS OF SOUTHERN CALIFORNIA
EDISON COMPANY (U 338-E) ON PROPOSED DECISION REFINING THE
RESOURCE ADEQUACY PROGRAM on all parties identified on the attached service list for
R.17-09-020. Service was effected by transmitting copies via e-mail to ALJ Peter V. Allen and
all parties who have provided an e-mail address, and by placing copies in sealed envelopes and
causing such envelopes to be delivered via United States mail with first-class postage prepaid to
the office of the Co-Assigned ALJ or other addressee(s):

ALJ Debbie Chiv
California Public Utilities Commission
Division of Administrative Law Judges, Room 5011
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Executed on December 17, 2018, at Rosemead, California.

/s/ Olivia Gutierrez
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