COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY TO THE CALIFORNIA AIR RESOURCES BOARD ON THE PROPOSED AMENDMENTS TO THE REGULATION FOR THE MANDATORY REPORTING OF GREENHOUSE GAS EMISSIONS AND CONFORMING AMENDMENTS TO THE DEFINITION SECTIONS OF THE AB 32 COST OF IMPLEMENTATION FEE REGULATION AND THE CAP-AND-TRADE REGULATION, RELEASED AUGUST 1, 2012

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I.

INTRODUCTION

Pursuant to the Notice of Public Hearing to Consider Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions and Conforming Amendments to the Definition Sections of the AB 32 Cost of Implementation Fee Regulation and the Cap-and-Trade Regulation, which was released on August 1, 2012,[1] Southern California Edison Company ("SCE") respectfully submits its comments to the California Air Resources Board ("ARB") on the proposed changes to the existing Regulation for the Mandatory Reporting of Greenhouse Gas Emissions,[2] or Mandatory Reporting Regulation ("Proposed MRR Amendments"). SCE appreciates this opportunity to participate and thanks ARB staff for their responsiveness throughout rulemaking the process.

The ARB proposed a number of changes to the cap-and-trade regulation[3] and the Administrative Fee Regulation[4] to ensure consistency with the Proposed MRR Amendments. To

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1 Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions and Conforming Amendments to the Definition Sections of the AB 32 Cost of Implementation Fee Regulation and the Cap-and-Trade Regulation, released August 1, 2012. Attachment A is the Proposed Amendments to the Regulation for the Mandatory Reporting of GHG. Attachment B is the Proposed Amendments to the California Cap and Trade and Market-Based Compliance Mechanisms. Attachment C is the Proposed Amendments to the AB 32 Cost of Implementation Fee Regulation. All three attachments can be found at http://www.arb.ca.gov/regact/2012/ghg2012/ghg2012.htm.

2 Regulation for the Mandatory Reporting of Greenhouse Gas Emissions ("MRR"), Cal. Code Regs. Tit. 17, §95100 et seq., *available at* http://www.arb.ca.gov/regact/2010/ghg2010/mrrfro.pdf.

3 See Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions and Conforming Amendments to the Definition Sections of the AB 32 Cost of Implementation Fee Regulation and the Cap-and-Trade Regulation, Attachment B. The cap-and-trade regulation's full name is the California Cap on

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the extent that the definition changes to the Proposed MRR Regulation also apply to the cap-and-trade regulation and the Administrative Fee Regulation, SCE's comments here will also apply to those regulation language modifications.

Below, SCE makes the following comments on the Proposed MRR Regulation:

- The ARB should publish the emission factor for each asset-controlling supplier no less than ninety days prior to the year for which the emission factors apply;
- The ARB should amend the cap-and-trade regulation to harmonize with the new MRR requirement for reporting Renewable Energy Credits ("RECs") placed in a retirement subaccount;
- To calculate electricity exports, the ARB should use as a reference point the first point of delivery outside of California rather than the final point of delivery outside of California;
- To calculate electricity imports, the ARB should consider electricity with a point of receipt outside of California in addition to electricity generated outside of California;
- The ARB should modify the transmission loss factors to harmonize with the above two points;
- The ARB should expand its plan to enforce mandatory reporting, especially for out-of-state entities; and
- SCE supports the amended definition of "unspecified source of electricity" but requests additional guidance regarding electricity imports from specified sources.

Several parties, including the Western Power Trading Forum,[5] TransAlta,[6] and Pacific Gas and Electric Company,[7] have already filed comments on the Proposed MRR Regulation, with

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Greenhouse Gas Emissions and Market-Based Compliance Mechanisms regulation and is found at Cal. Code Regs. Tit. 17, §95800 et seq. ("Cap-and-Trade Regulation").

4 See Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions and Conforming Amendments to the Definition Sections of the AB 32 Cost of Implementation Fee Regulation and the Cap-and-Trade Regulation, Attachment C.

5 *See* Comments of the Western Power Trading Forum on the Proposed Amendment to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions, August 30, 2012, *available at* http://www.arb.ca.gov/lists/ghg2012/1-8-30-12_wptf_comments_to_mandatory_reporting_regulation.pdf.

6 *See* TransAlta Comment Letter, September 10, 2012, *available at* http://www.arb.ca.gov/lists/ghg2012/2-transalta_mrr_comments_-_sept_2012.pdf.

additional comments likely. Together with SCE, these stakeholders identify a significant number of unresolved issues relating to the MRR and the cap-and-trade program such as resource shuffling, the treatment of electricity imports, qualified exports, and renewable energy. These issues are crucial to the proper functioning of the emissions markets and the success of the cap-and-trade program in general. SCE recommends that the ARB staff hold a workshop as soon as possible in order to respond to and address these issues before the program officially begins, particularly before the first auction on November 14, 2012.

II.

THE ARB SHOULD PUBLISH THE EMISSION FACTOR FOR EACH ASSET-CONTROLLING SUPPLIER NO LESS THAN NINETY DAYS PRIOR TO THE YEAR FOR WHICH THE EMISSION FACTORS APPLY

Section 95111(b)(3) of the Proposed MRR Amendments now specifies that the "ARB will calculate and publish on the ARB Mandatory Reporting website the system emission factors for all asset-controlling suppliers."[8] However, Section 95111 as proposed does not indicate a time frame for the ARB to post emission factors to the website. To correctly assess the value of imports, market participants must know the emission factor assigned to each asset-controlling supplier when they make their imports decisions. Emission factors for asset-controlling suppliers will play a role in determining the relative cost of electricity imports from different regions.[9] SCE recommends that the ARB establish a 90-day time frame for publishing the emission factors well before the year for which they will apply. This will provide market participants sufficient time to

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7 *See* Pacific Gas and Electric Company's Comments on the Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions, September 10, 2012, *available at* http://www.arb.ca.gov/lists/ghg2012/3-091012_mrr_comments_final.pdf.

8 Proposed MRR Amendments §95111(b)(3), at 35 (emphasis supplied).

9 For example, an energy trader deciding whether to fill a short power position with electricity imported from Bonneville Power Administration ("BPA") or Arizona Public Service ("APS") will need to know what emissions factor to use in calculating the GHG compliance obligation associated with the transaction. While an APS import may be more economical due to lower transmission costs if both entities are assigned the emission factor for unspecified sources, the assignment to BPA of an asset-controlling supplier emission factor that is significantly lower may make a BPA import the more economical choice.

incorporate the emission factor into forward power pricing and to adapt their systems and processes before the emission factors become effective.

Specifically, SCE recommends that the ARB amend the language in Section 95111(b)(3) to add:

> Based on annual reports submitted to ARB pursuant to section 95111(f), ARB will calculate and publish on the ARB Mandatory Reporting website the system emission factor for all asset-controlling suppliers recognized by the ARB. Asset-controlling supplier emission factors will be updated before each calendar year for which they apply. Notification of the next year's asset-controlling supplier emission factors will be published on the ARB Mandatory Reporting website no less than ninety (90) days prior to the beginning of that year.

III.

THE PROPOSED MRR AMENDMENTS CORRECTLY REQUIRE THE REPORTING OF RECS PLACED IN A RETIREMENT SUBACCOUNT; THE ARB SHOULD AMEND THE CAP-AND-TRADE REGULATION TO HARMONIZE WITH THIS REQUIREMENT

SCE commends the ARB for requiring entities in Section 95111(g)(1)(M) to report to the ARB when RECs have been reported as an RPS Adjustment and whether they have been placed in a Western Renewable Energy Generation Information System ("WREGIS") retirement subaccount.[10] It is crucial for the ARB to be able to tell whether a REC has been placed in an entity's retirement subaccount to ensure that the electricity is being used for RPS compliance in California.

SCE also recommends that the ARB amend the cap-and-trade regulation to specify that RECs must be held in a retirement subaccount and consequently retired for California RPS compliance in order to claim the RPS Adjustment for imports of specified renewable electricity. Otherwise, one compliance entity might claim an RPS Adjustment tied to a specific REC, then sell

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[10] Proposed MRR Amendments § 95111(g)(1)(M), at 39-40.

the REC to a buyer that also claims the RPS Adjustment. This addition to the cap-and-trade regulation will eliminate the potential for double-counting of the zero emissions attributed to out-of-state renewable electricity in the event a REC is sold.

IV.

THE ARB SHOULD AMEND ITS DESIGNATION OF IMPORTED AND EXPORTED ELECTRICITY TO ALLOW FOR THE EFFICIENT USE OF THE QUALIFIED EXPORTS ADJUSTMENT

1. To calculate electricity exports, the ARB should reference the "*first* point of delivery outside of California" rather than the "*final* point of delivery outside of California."

The current and proposed MRR language indicates that electricity exports will be measured at their sink, or "final point of delivery."[11] Section 95102(a)(423) of the Proposed MRR Amendments modifies the definition for "sink," "sink to load," or "load sink" to the "sink identified on the physical path of North American Electricity Reliability Council ("NERC") e-Tags, where defined points have been established through the NERC Registry. Exported electricity is disaggregated by the sink on the NERC e-Tag, also referred to as the final point of delivery on the NERC e-Tag."[12] As discussed below, measuring exports from the final point of delivery can be problematic when calculating the Qualified Exports ("QE") Adjustment in the cap-and-trade regulation.

Section 95852(b)(5) of the cap-and-trade regulation provides that a QE Adjustment "may be made for exported and imported electricity during the same hour by the same PSE [purchasing-selling entity]."[13] This allows compliance entities to wheel electricity through California within

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[11] MRR § 95111(a)(6)(A), at 96; see also MRR § 95102(a)(142), at 26 (defining "exported electricity"); § 95102(a)(173) (defining "final point of delivery"), and § 95102(a)(189), at 32 (defining "sink").

[12] Proposed MRR Amendments § 95102(a)(423), at 22.

[13] Cap-and-Trade Regulation, Cal.Code Regs. Tit. 17; § 95852(b)(5).

the same hour using multiple tags without incurring a compliance obligation. These transactions are necessary for the efficient movement of power through the Western Electricity Coordinating Council ("WECC"). To maintain the integrity of the ARB's QE Adjustment and to continue to allow for multiple-tag wheels, the ARB should revise the MRR to track exports by the *first* point -- rather than the *final* point -- of delivery outside of California.

Distinguishing between the "final" and "first" point of delivery in California is crucial because exporters cannot know with any certainty where the final point of delivery will be for the electricity they sell. Without this clarification, for example, an entity may sell electricity at an out-of-state intertie and bring a concurrent import into the state with the intent to form a multiple-tag wheel and claim the QE Adjustment. However, a downstream purchaser at the intertie may subsequently bring the exported electricity back into California. This electricity would then have a "final point of delivery" inside California and will not be counted as an export under the ARB's rules, which could cause the concurrent electricity import to become uneconomic because the original seller could no longer claim the QE Adjustment. In addition, the downstream purchaser of the electricity will be able to bring the power into California without any compliance obligation, resulting in an unintended shift of wealth from the original seller to the buyer.

While exporters do not know the final point of delivery for the electricity they sell, they do know where they are delivering the electricity -- the "first point of delivery." By tracking exports by the first point of delivery outside of California, exporters will have confidence that their multiple-tag wheels will be correctly accounted for in the QE Adjustment. SCE offers the following suggested modifications to the Proposed MRR Amendments so that exports are tracked by their first point of delivery outside of California:

- 95102(a)(142): "Exported Electricity" means electricity generated inside the state of California and delivered to ~~serve load located~~ a point of delivery outside the state of California. This includes electricity delivered from a first point of receipt inside California, to the first point of delivery outside California~~, with a final point of delivery outside the state of California~~. Exported electricity delivered across balancing authority areas is documented on NERC e- Tags with the first point of receipt located inside the state of California and ~~the final~~ a point of delivery located outside the state of California. Exported

electricity ~~does not~~ includes electricity generated inside the state of California then transmitted outside of California, ~~but with~~ even if it has a final point of delivery inside the state of California. Exported electricity does not include electricity generated inside the state of California that is allocated to serve the California retail customers of a multi-jurisdictional retail provider, consistent with a cost allocation methodology approved by the California Public Utilities Commission and the utility regulatory commission of at least one additional state in which the multi-jurisdictional retail provider provides retail electric service. Exported electricity is disaggregated by the first point of delivery outside of California as documented on the NERC e-Tag.

- 95102(a)(173): "Final point of delivery" means the sink specified on the NERC e-Tag, where defined points have been established through the NERC Registry. When NERC e-Tags are not used to document electricity deliveries, as may be the case within a balancing authority, the final point of delivery is the location of the load. ~~Exported electricity is disaggregated by the final point of delivery on the NERC e-Tag.~~

- (*New*) 95102(a)(175): "First point of delivery outside of California" means the first defined point on the transmission system located outside California at which exported electricity and electricity wheeled through California may be measured, consistent with defined points that have been established through the NERC registry.

- 95102(a)(423): "Sink" or "sink to load" or "load sink" means the sink identified on the physical path of NERC e-Tags, where defined points have been established through the NERC Registry. ~~Exported electricity is disaggregated by the sink on the NERC e-Tag, also referred to as the final point of delivery on the NERC e-Tag.~~

- 95111(a)(6): *Exported electricity.* The electric power entity must report exported electricity in MWh and associated GHG emissions in MT of CO2e for unspecified sources disaggregated by each ~~final~~first point of delivery outside the state of California, and for each specified source disaggregated by each ~~final~~first point of delivery outside the state of California, as well as the following information:

  (A) Exported electricity as measured at the ~~last~~first point of delivery located in the state of California~~, if known. If unknown, report as measured at the final point of delivery outside California~~.
  (B) Do not report estimated transmission losses.
  (C) Report whether the ~~final~~ first point of delivery is located in a linked jurisdiction published on the ARB Mandatory Reporting website.
  (D) Report GHG emissions calculated pursuant to section 95111(b).
  (E) Separately report qualified exports as defined in section 95102(a).

2. <u>To calculate electricity imports, the ARB should consider electricity with a point of receipt outside of California in addition to electricity generated outside of California.</u>

To harmonize with the suggested changes for measuring electricity exports above, the ARB should make additional changes to the definition of "imported electricity" in Section 95102(a)(204) of the MRR. If the definition of imported electricity remains as is, but exports are no longer determined by the "final point of delivery," or sink, of electricity, then electricity that travels outside of California but then sinks inside the state would be considered an export.

Although electricity produced and consumed in California should have a compliance obligation, it may not if this "export" is used for a QE Adjustment. To remedy this improper accounting of a compliance obligation, such a transaction should be split into two distinct transactions: (1) an export out of California, which may reduce an entity's compliance obligation if used in the QE Adjustment, and (2) an import into California, which carries a compliance obligation. Under the current rules, "imports" are currently defined as "electricity generated outside of California" and the second half of the transaction would not be considered an import, and consequently would have no compliance obligation. To ensure appropriate accounting of compliance obligations, the ARB should consider any electricity brought into California from a point of receipt outside of California as an import, regardless of where that electricity was generated. SCE offers the following modifications below:

- "95102(a)(204): "Imported electricity" means electricity ~~generated~~<u>delivered from a point of receipt</u> outside the state of California and ~~delivered to serve load~~<u>to a final point of delivery</u> located inside the state of California. Imported electricity includes electricity delivered across balancing authority areas from a ~~first~~point of receipt located outside the state of California, to the first point of delivery located inside the state of California, having a final point of delivery in California. Imported electricity includes electricity imported into California over a multi-jurisdictional retail provider's transmission and distribution system, or electricity imported into the state of California from a facility or unit physically located outside the state of California with the first point of interconnection to a California balancing

> authority's transmission and distribution system. Imported electricity includes electricity that is a result of cogeneration located outside the state of California. Imported electricity does not include electricity wheeled through California, defined pursuant to this section. Imported electricity does not include electricity imported into the California Independent System Operator (CAISO) balancing authority area to serve retail customers that are located within the CAISO balancing authority area, but outside the state of California."

Requiring exports to be designated by the "first point of delivery" outside of California will prevent unintended shifts of wealth from an intertie seller of California electricity to an intertie purchaser of California electricity. Such changes will reduce risks associated with multiple-tag wheels and help to maintain the efficient flow of electricity in and out of California.

V.

IN ORDER TO MAINTAIN CONSISTENCY WITH THE ARB'S PROPOSED DEFINITION OF THE "FIRST POINT OF RECEIPT," THE TRANSMISSION LOSS FACTORS IN SECTION 95111(B) SHOULD BE CHANGED TO REFER TO THE "FIRST POINT OF DELIVERY," RATHER THAN THE "FIRST POINT OF RECEIPT"

In the current MRR, the transmission loss factors in Section 95111(b) refer to the "first point of receipt in California"[14] to refer to the first point at which electricity is brought into California. However, a discrepancy is created with the Proposed MRR Amendments, which propose a new definition for "First point of receipt" that references the point closest to the generation source even though this point may be located *outside* of California.[15] To maintain the section's original meaning, the relevant portions of Section 95111(b) should be changed to say "first point of *delivery* in California," as outlined below.

- 95111(b): *Calculating GHG Emissions*.

Calculating GHG Emissions from Unspecified Sources.
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[14] MRR § 95111(b), at 97-102.
[15] Proposed MRR Amendments § 95102(a)(176), at 12.

TL = 1.02 to account for transmission losses between the busbar and measurement at the first point of ~~receipt~~delivery in California.

Calculating GHG Emissions from Specified Facilities or Units.

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TL = 1.02 when deliveries are not reported as measured at the busbar, to account for transmission losses between the busbar and measurement at first point of ~~receipt~~ delivery in California.
TL = 1.0 when deliveries are reported as measured at the busbar.

VI.

THE ARB SHOULD EXPAND ITS PLAN TO ENFORCE MANDATORY REPORTING, ESPECIALLY FOR OUT-OF-STATE ENTITIES

SCE continues to urge the ARB to develop a plan for enforcing the mandatory reporting of emissions, particular for those importers that transact at out-of-state interties. As discussed more thoroughly in its comments on the May 9, 2012 Proposed Amendments to the Cap-and-Trade Regulation,[16] SCE has serious concerns about gaps in emissions reporting from first deliverers of electricity, and the potential effects on both greenhouse gas ("GHG") markets and electricity markets. As discussed in earlier comments, out-of-state entities could choose not to report emissions associated with sales into the California Independent Systems Operator ("CAISO") territory at out-of-state interties, under the pretext that the ARB does not have jurisdiction over these sales (and correspondingly, the emissions associated with these sales).[17] If the ARB cannot determine whether there are missing emissions from its reports, or if the ARB is unable to fully assert its jurisdiction over such sellers, there would likely be damaging effects on the GHG and electricity markets.

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[16] Comments of Southern California Edison Company to the California Air Resources Board on the Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms to Allow for the Use of Compliance Instruments by Linked Jurisdictions, June 22, 2012, at 10-12, *available at* http://www.arb.ca.gov/lists/capandtradelinkage12/3-2012-06-22_comments_on_45-day_changes_and_linkage.pdf.

[17] See, e.g., Comments of Arizona Public Service Company to the California Air Resources Board on the May 30th Public Workshop regarding the General Overview of Proposed Changes Workshop to Discuss Revisions to Mandatory Reporting Regulation, June 25, 2012, at 2-3, *available at* http://www.arb.ca.gov/cc/reporting/ghg-rep/revision_2012/epe_comment_aps.pdf.

SCE proposes two concrete steps for the ARB to address these outstanding concerns. First, the ARB should initiate a process for collecting the data needed to identify *all* electricity imports into California. This data must include all NERC e-Tags created when electricity is scheduled into California. SCE is encouraged that the ARB appears to be seeking e-Tag data from the CAISO, but reviewing only those e-Tags where the CAISO is listed as the PSE is neither comprehensive nor sufficient.[18] Furthermore, as of August 1, 2012, the CAISO will no longer approve any e-Tags if the CAISO is listed in them as the PSE.[19] Therefore, the data that the ARB will obtain from the CAISO will be irrelevant in verifying that all electricity imports are accounted for after cap-and-trade program compliance begins. Instead, in order to verify that all electricity imports are accounted for, the ARB must independently obtain e-Tag data for all e-Tags that were created to document the electricity imports into any of the California balancing area authorities, regardless of who is the PSE. Second, the ARB must develop a process for enforcing compliance on those entities that do not report their emissions. The ARB should formally outline its regulatory and statutory authority to enforce compliance, as well as the enforcement actions it will take and the consequences for non-compliance. SCE urges the ARB to adopt these steps in order to prevent foreseeable inefficiencies in emissions and electricity markets.

VII.

SCE SUPPORTS THE AMENDED DEFINITION OF "UNSPECIFIED SOURCE OF ELECTRICITY" BUT REQUESTS ADDITIONAL GUIDANCE REGARDING ELECTRICITY IMPORTS FROM SPECIFIED SOURCES

Section 95102(a)(471) of the Proposed MRR Amendments amends the definition of "Unspecified source of electricity" to a "source of electricity that is not a specified source at the

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[18] *See* Subpoena Duces Tecum from the California Air Resources Board to the California Independent Systems, Operator Regarding an Inquiry Into 2011-2012 Mandatory Greenhouse Gas Emissions Reporting Data, August 7, 2012, *available at* http://www.caiso.com/Documents/August7_2012ARB-GreenhouseGasSubpoena.pdf. The subpoena seeks e-Tag information for all imports, exports, and wheels where CAISO is listed as the PSE on the NERC e-Tag.

[19] *See* CAISO Market Notice, NERC E-Tag Automatic Validation Enforcement, July 31, 2012, *available at* http://www.caiso.com/Documents/NERC_E-TagAutomaticValidationEnforcement.htm.

time of entry into the transaction to procure the electricity."[20] The revised definition is simpler and clearer than the definition proposed in the previous draft of the regulation. SCE supports this modification and offers no suggestion for improvement at this time.

However, SCE recommends that the ARB should better define a "power contract" when claiming electricity imports from a specified source. SCE shares other commenters' concerns that the current definitions and reporting requirements require additional clarity for compliance entities as well as third-party verifiers, regarding how an entity can claim electricity imports from a specified source and count the corresponding emissions at a source-specific emissions rate. In this regard, SCE supports WPTF's recommended definition that a "specified power contract" should mean a power purchase agreement that is contingent upon delivery of electricity from a specific unit or facility, or from an asset-controlling supplier's system, designated at the time of entry into the transaction to procure the electricity. [21]

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[20] Proposed MRR Amendments § 95102(a)(471), at 23.

[21] *See* Comments of the Western Power Trading Forum on the Proposed Amendment to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions, August 30, 2012, *available at* http://www.arb.ca.gov/lists/ghg2012/1-8-30-12_wptf_comments_to_mandatory_reporting_regulation.pdf.

VIII.

CONCLUSION

SCE appreciates the opportunity to comment on the Proposed MRR Amendments. SCE looks forward to continuing to work with ARB staff on developing the MRR and the cap-and-trade program, and urges the ARB to make the modifications suggested herein.

Respectfully submitted,

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