

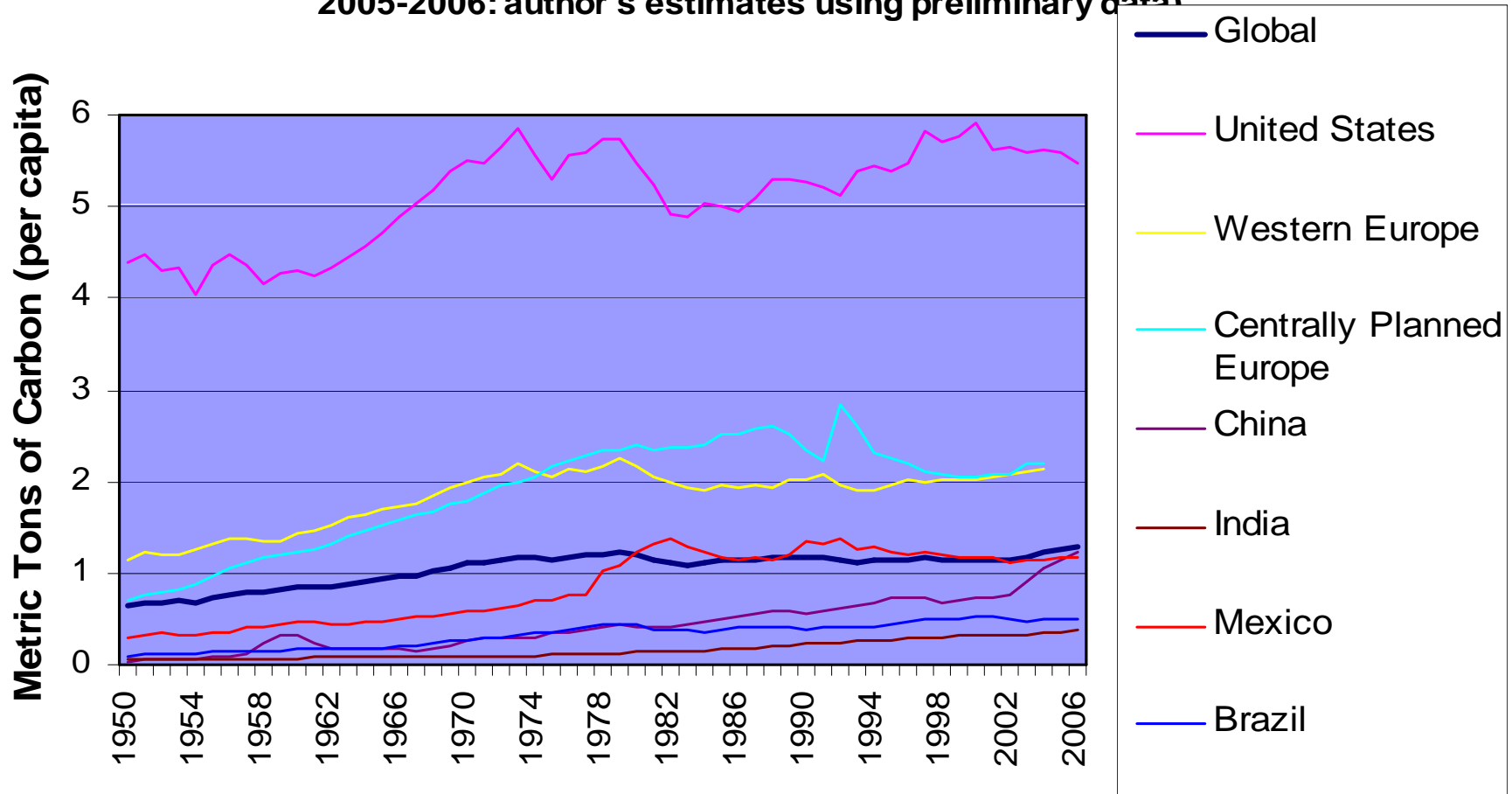
Transitioning to a Carbon-Constrained World: The Role of PUCs

**Rick Morgan
Commissioner
D.C. Public Service Commission**

**MACRUC Climate Panel
June 30, 2010**

US per capita emissions stable and high

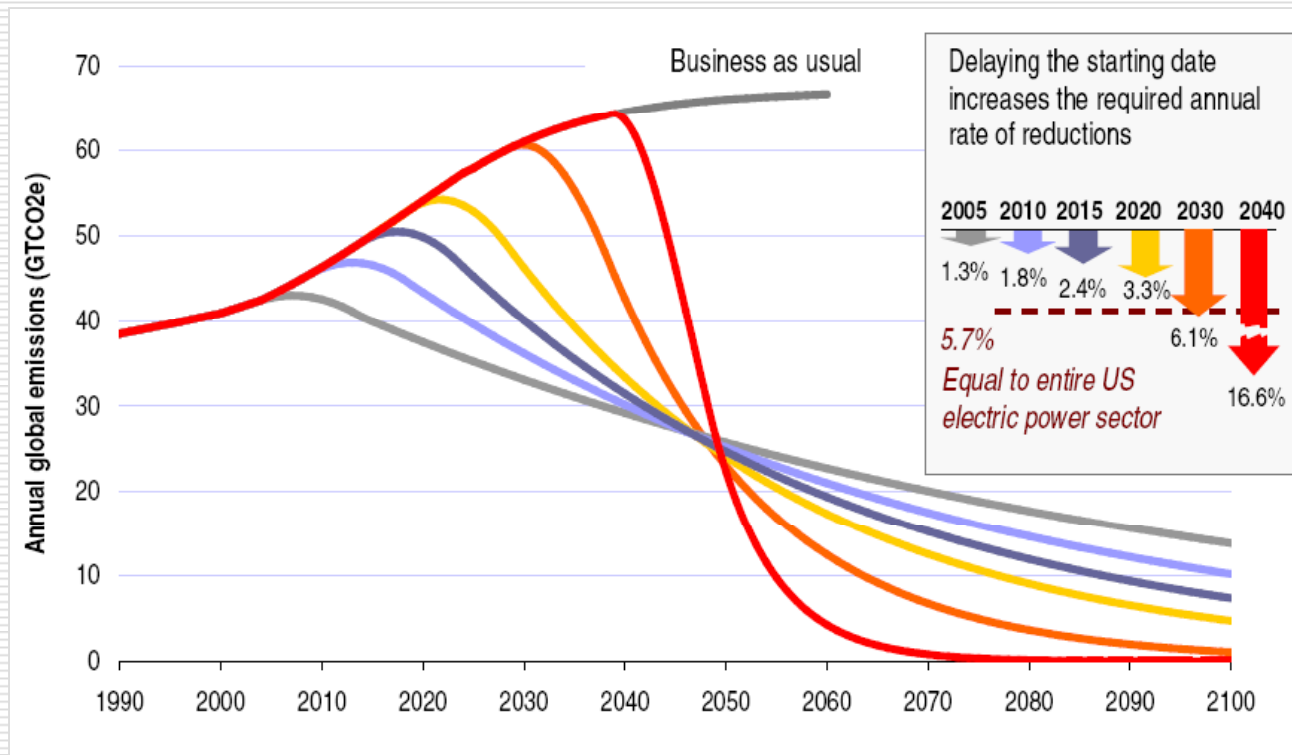
Figure 1: Per Capita Emission Trends 1950-2006
(Data sources: Marland et al. 2007 (data through 2004),
2005-2006: author's estimates using preliminary data)



Meyerson, F.A.B. 2009. Population. *in* Schneider, Stephen et al. (eds). Climate Change Science and Policy. Island Press, Washington, DC.

Different pathways to 450 ppm – Delay can be very costly

Delaying strong action will necessitate a much stronger response in the future



- Current estimates of the costs are of about 2% of GDP (per year) if immediate action is taken
- A ten-year delay could double the annual costs and costs rise to up to 20% GDP if no action is taken



Climate policy & energy are intertwined

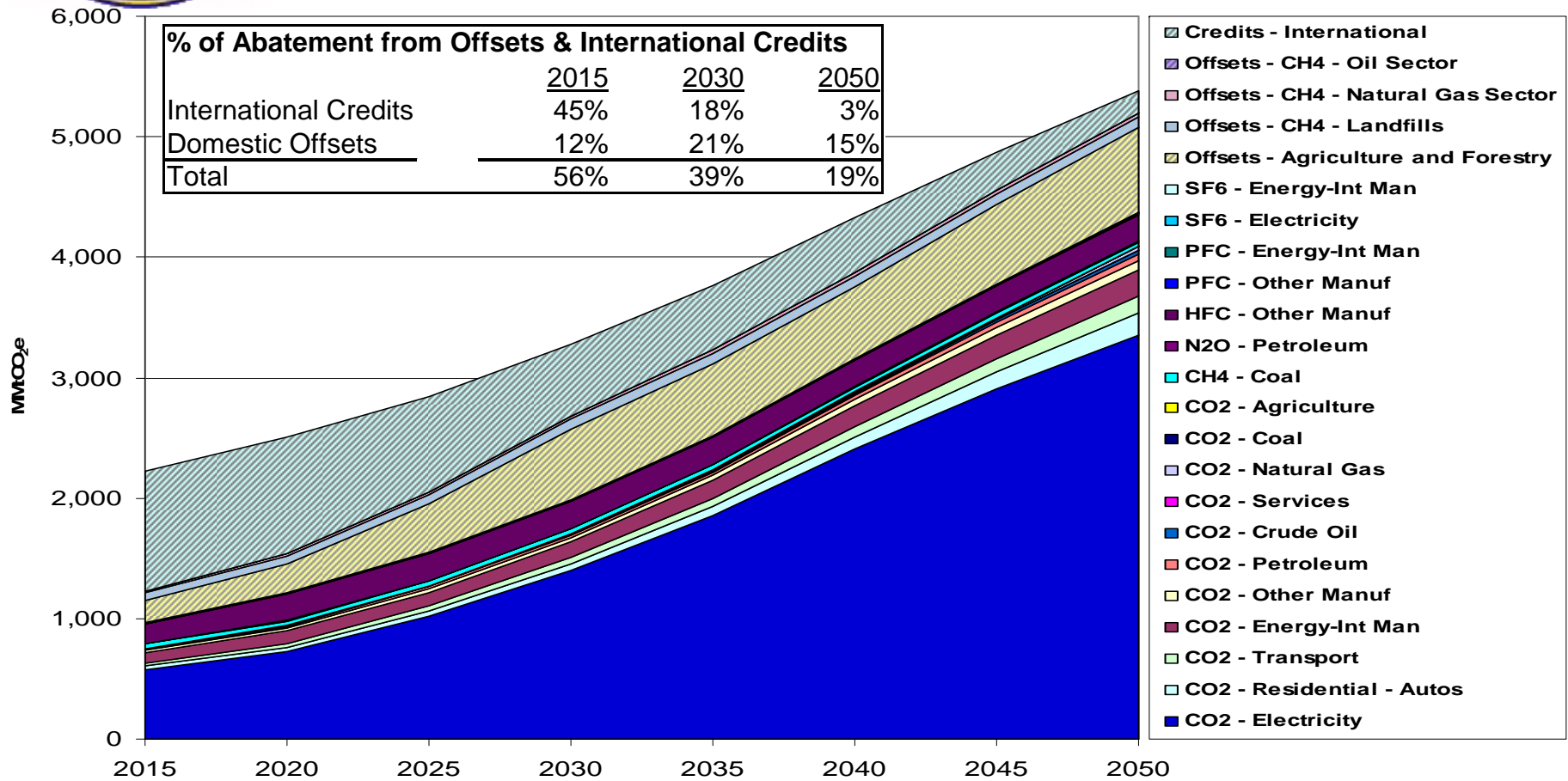
- Electric & gas industries dominate U.S. CO₂ emissions
 - 40% of U.S. CO₂ from power generation
 - 14% from retail natural gas usage
- PUCs will have key role in U.S. response to climate change
 - Policy choices re: energy resources
 - Approval of financing & cost recovery for utilities
 - Protecting ratepayer interests





Power sector bears much of the burden

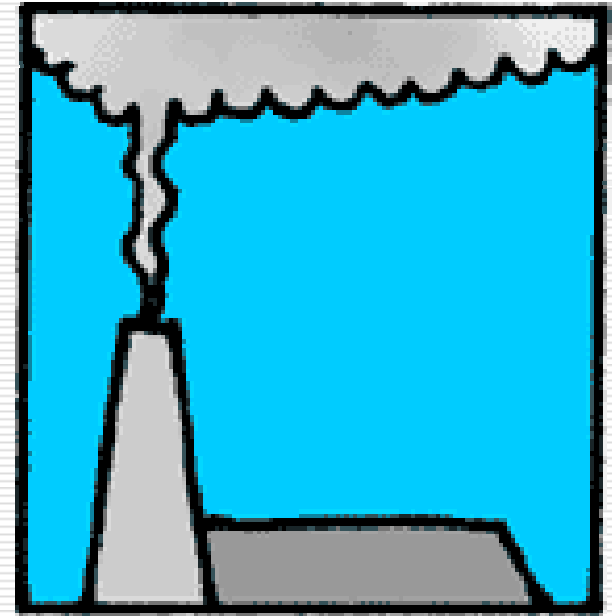
Sources of GHG Abatement US EPA11-07; S. 280 Senate Scenario



***Power generation is ~40% of the problem –
but may be called upon to be 75% of the solution!***

Where will power sector CO₂ reductions come from?

- Three options:
 - Re-dispatch the existing fleet
 - Lower the emission profile of new generation
 - Reduce consumption

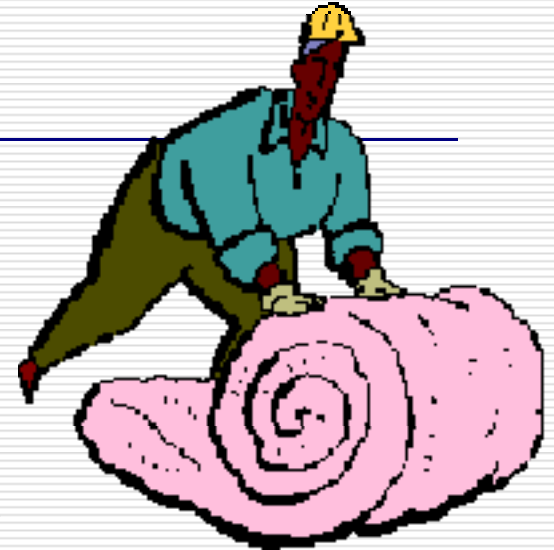


“Efficiency programs can save 7x more carbon per consumer \$ than carbon taxes or prices”

– Richard Cowart, Regulatory Assistance Project

Proactive climate policies for PUCs

- Require utility assessment of climate-related risk
 - Resource acquisition policies
 - Incorporate carbon prices, uncertainty
 - Consider value of EE in reducing risk
 - Consider societal benefits of emerging low-carbon technologies such as CCS
 - Timely recovery of prudent costs
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Subtle PUC policies that could make things worse

- Policies that shift risk to consumer:
 - Automatic fuel adjustment clauses
 - Special cost recovery for environmental costs
 - Approval of new fossil generation w/o climate risk assessment

- Policy barriers to EE:
 - Declining-block rates
 - Focus on minimizing rates, not customer bills





NARUC resolution re: state climate policies*



- Cost per ton of reducing GHGs can vary dramatically depending on path chosen
- PUCs should consider adoption of polices to:
 - Preserve system reliability while minimizing cost
 - Facilitate greater reliance on low-carbon resources & support R&D funding
 - Ensure timely utility recovery of prudent costs
 - Require utilities to assess and incorporate climate-related risks in planning & decisions

*<http://www.naruc.org/Resolutions/ERE1%20Resolution%20on%20State%20Regulatory%20Policies%20Toward%20Climate%20Change.pdf> 10

Messages from NARUC-NCEP Climate Conference, 12/09

- Coherent message from a broad mix of speakers:
 - Academics, utilities, regulators, financial community, activists
- Much agreement on key policy points:
 - **Decarbonizing the power sector** is essential -- *while also* electrifying transport and housing
 - Carbon **pricing** (tax or cap) is not enough,
 - A suite of **policies** is essential on demand, delivery and supply,
 - Many of those policies are **in the hands of states and PUCs** – with or without federal action

- Conference presentations:

<http://www.naruc.org/meetingpresentations.cfm?148>

Appendix

No scenario works without an “Efficiency First” commitment

□ *“If I were emperor of the world, I would put the pedal to the floor on energy efficiency and conservation for the next decade.”*

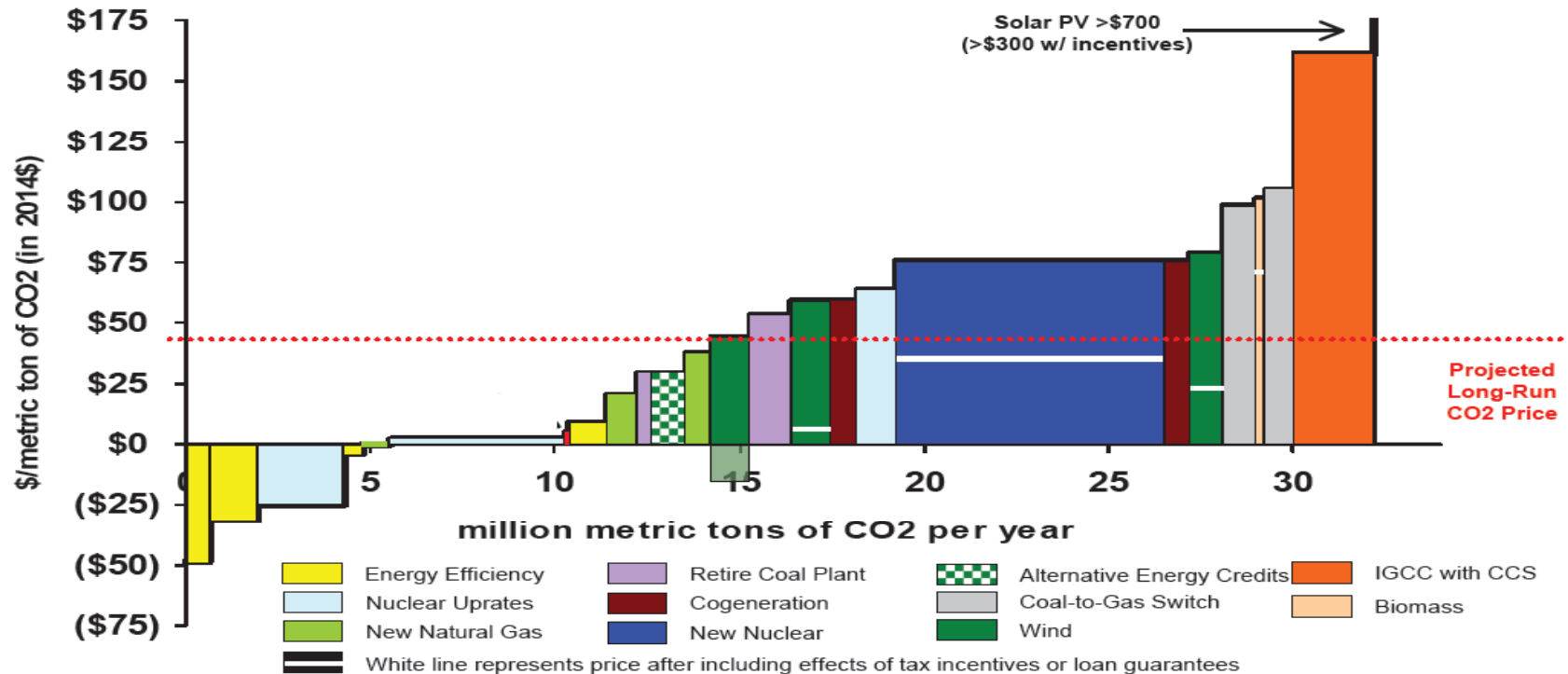
— Dr. Stephen Chu, United States Secretary of Energy

□ Gina McCarthy -- *“No matter what approach we take, if we don’t focus on efficiency, the costs are staggering...Energy efficiency is the foundation of every strategy we can develop”*

We can't rely on carbon prices to deliver the needed investments

Cost of Carbon Mitigation in Electricity Supply

1



Note: Emissions abatement estimates for new generation capacity represents emissions reduced in the market as a result of the project less emissions introduced due to the project (if any). New nuclear plants assumes 1,460 MW of new generation.

Cap-and-trade legislation will encourage us to do the cheapest options first

Elements of a 2050 Roadmap – State PUCs roles in every step:

1. Deliver “Efficiency First” policies and programs
 2. Halt lock-in of new unabated coal
 3. Accelerate CCS for coal and gas
 4. Add large-scale renewables
 5. Grid expansion and access rules for renewables
 6. Support nuclear where competitive
 7. Electrify light-duty transportation (and buildings where needed)
 8. Build a Smart/Green Grid for DR, EVs, PVs, etc.
 9. Regulation and finance – Support profitable business models for utilities and investors
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