

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Harbor Cogeneration Company, LLC) Docket No. ER21-1321-000

**MOTION TO INTERVENE AND COMMENTS OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure¹ and the Combined Notice of Filing issued on March 11, 2021 in this docket, the California Independent System Operator Corporation (CAISO) submits this motion to intervene and comments on the petition for limited waiver submitted by Harbor Cogeneration Company, LLC (Harbor) in this docket on March 10, 2021.

I. Motion to Intervene

The CAISO is a non-profit public benefit corporation organized under the laws of the State of California with its principal place of business at 250 Outcropping Way, Folsom, California 95630. The CAISO operates under its Commission-approved tariff. Through its filing in this docket, Harbor requests the Commission waive certain provisions of that tariff. The CAISO has a substantial and direct interest in this proceeding. Because no other party can adequately represent the CAISO's interests in the proceeding, the CAISO's intervention is in the public interest and should be granted.

¹ 18 C.F.R. § 385.214.

II. Communications

In accordance with Rule 203(b) of the Commission's Rules of Practice and Procedure,² the CAISO respectfully requests that service of all pleadings, documents, and all communications regarding this proceeding be addressed to the following individuals:

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California Independent System
Operator Corporation
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III. Comments

Harbor's filing states that the CAISO does not oppose Harbor's requested waiver of resource adequacy availability incentive mechanism (RAAIM) charges. The CAISO confirms that is the case. The CAISO also agrees with Harbor's basic recitation of the key events leading to this waiver. Aside from confirming these two points, the CAISO also submits these comments to address the financial impact of Harbor's request.

As Harbor explained in its filing, RAAIM involves the CAISO assessing non-availability charges to RA resources whose performance over a month falls below a defined availability threshold and pays availability incentive payments to RA resources whose performance over a month exceeds a defined availability threshold. The

² 18 C.F.R. § 385.203(b)(3).

CAISO tariff states that incentive payments “will be funded entirely through the monthly Non-Availability Charges assessed.”³ This means that RAAIM is a self-funding mechanism and the CAISO only makes incentive payments to the extent it has assessed non-availability charges. To prevent RAAIM incentive payments from providing a windfall to high-performing resources, a resource’s monthly incentive rate is capped at three times the rate for non-availability charges.⁴ Any funds remaining for a month after applying this payment cap are “added to the funds available for Availability Incentive Payments in the next month and will continue to roll over to successive months until the end of the year.”⁵ Funds remaining at the end of the year are distributed “to Load Serving Entities based on their load ratio share for the year.”⁶

Harbor’s request covers RAAIM charges assessed for October 2020 and November 2020. Attachment A reports the RAAIM non-availability charges and incentive payments by scheduling coordinator for these two months.⁷ Even after applying the cap on payments, these two months combined still have over \$6 million in excess RAAIM charges remaining. This reflects that granting Harbor’s request would not reduce the pool of RAAIM charges collected to the extent that resources that receive an incentive payment in October or November would see those payments reduced on resettlement. Additionally, December 2020 RAAIM non-availability charges were sufficient to fund December 2020 incentive payments fully. This means

³ CAISO tariff section 40.9.6.2(a).

⁴ CAISO tariff section 40.9.6.2(c)(2) (“The Availability Incentive Payment rate shall not exceed three times the Non-Availability Charge rate”).

⁵ CAISO tariff section 40.9.6.2(d).

⁶ *Id.*

⁷ The table redacts the identities of the scheduling coordinators.

that granting Harbor's waiver would reduce by \$467,000 the pool of excess annual funds distributed to load serving entities by their load ratio share.

IV. Conclusion

The CAISO respectfully requests that the Commission grant the CAISO's motion to intervene and consider its comments.

Respectfully submitted,

/s/ David S. Zlotlow

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Dated: March 31, 2021

Attachment A

RAAIM for October & November 2020 by Scheduling Coordinator**RAAIM is resource-specific charge so same SC can have incentive and charge in same month**

SC ID	Incentive	Charge	Net RAAIM (+ means incentive)
SC_1	\$355,380	\$0	\$355,380
SC_2	\$211,468	\$0	\$211,468
SC_3	\$121,583	\$0	\$121,583
SC_4	\$144,605	-\$29,692	\$114,913
SC_5	\$113,637	\$0	\$113,637
SC_6	\$108,143	\$0	\$108,143
SC_7	\$524,548	-\$416,610	\$107,938
SC_8	\$104,708	\$0	\$104,708
SC_9	\$99,906	\$0	\$99,906
SC_10	\$59,350	-\$16,154	\$43,196
SC_11	\$35,771	\$0	\$35,771
SC_12	\$35,267	\$0	\$35,267
SC_13	\$32,007	-\$4,566	\$27,441
SC_14	\$26,291	\$0	\$26,291
SC_15	\$23,209	\$0	\$23,209
SC_16	\$21,467	\$0	\$21,467
SC_17	\$16,802	-\$19	\$16,783
SC_18	\$8,554	\$0	\$8,554
SC_19	\$8,099	\$0	\$8,099
SC_20	\$8,007	\$0	\$8,007
SC_21	\$8,000	\$0	\$8,000
SC_22	\$7,718	\$0	\$7,718
SC_23	\$6,390	\$0	\$6,390
SC_24	\$6,339	\$0	\$6,339
SC_25	\$6,133	\$0	\$6,133
SC_26	\$5,329	\$0	\$5,329
SC_27	\$4,770	\$0	\$4,770
SC_28	\$4,312	\$0	\$4,312
SC_29	\$4,259	\$0	\$4,259
SC_30	\$3,618	\$0	\$3,618
SC_31	\$3,456	\$0	\$3,456
SC_32	\$3,407	\$0	\$3,407
SC_33	\$3,407	\$0	\$3,407
SC_34	\$4,237	-\$886	\$3,351
SC_35	\$2,925	\$0	\$2,925
SC_36	\$2,726	\$0	\$2,726
SC_37	\$2,305	\$0	\$2,305
SC_38	\$1,617	\$0	\$1,617
SC_39	\$1,363	\$0	\$1,363
SC_40	\$5,617	-\$4,337	\$1,280
SC_41	\$1,166	\$0	\$1,166
SC_42	\$441	\$0	\$441

Attachment A -- CAISO Comments on Harbor Cogeneration Co. Waiver Filing

SC ID	Incentive	Charge	Net RAAIM (+ means incentive)
SC_43	\$341	\$0	\$341
SC_44	\$57	-\$580	-\$523
SC_45	\$10,077	-\$11,665	-\$1,588
SC_46	\$0	-\$1,933	-\$1,933
SC_47	\$0	-\$3,273	-\$3,273
SC_48	\$0	-\$3,283	-\$3,283
SC_49	\$5,702	-\$9,535	-\$3,833
SC_50	\$170	-\$5,286	-\$5,116
SC_51	\$46,179	-\$53,997	-\$7,818
SC_52	\$161	-\$9,413	-\$9,252
SC_53	\$412	-\$13,642	-\$13,230
SC_54	\$2,816	-\$21,939	-\$19,123
SC_55	\$0	-\$30,747	-\$30,747
SC_56	\$5,330	-\$55,264	-\$49,934
SC_57	\$0	-\$52,463	-\$52,463
SC_58	\$0	-\$71,793	-\$71,793
SC_59	\$38,266	-\$118,656	-\$80,390
SC_60	\$190,543	-\$281,866	-\$91,323
SC_61	\$18,982	-\$110,648	-\$91,666
SC_62	\$11,209	-\$114,433	-\$103,224
SC_63	\$60,081	-\$190,666	-\$130,585
SC_64	\$308,758	-\$445,819	-\$137,061
SC_65	\$52,457	-\$313,130	-\$260,673
SC_66	\$1,331	-\$434,317	-\$432,986
SC_67	\$176,325	-\$636,348	-\$460,023
SC_68	\$375,599	-\$942,580	-\$566,981
SC_69	\$4,164	-\$618,484	-\$614,320
SC_70	\$761,744	-\$5,263,065	-\$4,501,321
TOTAL	\$4,219,041	-\$10,287,089	-\$6,068,048

CERTIFICATE OF SERVICE

I certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California this 31st day of March, 2021.

/s/ Anna Pascuzzo

Anna Pascuzzo