

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Consider
Revisions to the Planning Reserve Margin for
Reliable and Cost-Effective Electric Service.

Rulemaking 08-04-012
(Filed April 10, 2008)

**RESPONSE OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION TO TURN'S MOTION FOR ADOPTION OF PROTECTIVE
ORDER AND APPLICATION OF RULES 10.3 AND 10.4**

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August 11, 2008

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I. INTRODUCTION

Pursuant to Rule 11.1 (e) of the Commission's Rules of Practice and Procedure, the California Independent System Operator Corporation (CAISO) submits this Response to the Motion for Protective Order and Application of Rules 10.3 and 10.4 filed by The Utility Reform Network (TURN) on July 25, 2008.

CAISO generally supports TURN's Motion for Adoption of a Protective Order and Application of Rules 10.3 and 10.4, and agrees with TURN that the Model Protective Order (MPO) adopted by the Commission in D. 08-04-023 is a reasonable starting point for the resolution of data confidentiality issues. As acknowledged by TURN, however, the CAISO *does* believe that there are issues unique to this proceeding, particularly regarding the applicability of Commission Rules of Practice and Procedure 10.3 (Computer Model Documentation) and 10.4 (Computer Model and Data Base Access). As explained below, the CAISO will need the cooperation of the parties to limit the total number of base and sensitivity cases to seventy-two; or, in the event the parties cannot reach an agreement, an order by the Administrative Law Judge (ALJ) to reach a limit of

seventy-two base and sensitivity cases, pursuant to Rule 1.2, which permits deviation from the Rules of Practice and Procedure for “good cause.”

II. RESPONSE

Rules 10.3¹ and 10.4² were designed to implement Public Utilities Code Sections 1821 – 1822 (enacted by AB 475, the “No Black Box” legislation), and intended to ensure access to computer models and data bases used by the Commission, Commission staff, and parties in Commission proceedings, so that said computer models and inputs are available for verification by parties. The CAISO appreciates that Rules 10.3 and 10.4 are necessary to allow for meaningful participation by parties in a proceeding, but thinks it would be remiss if it did not articulate why strict applicability of Rules 10.3 and 10.4 may be unattainable in this proceeding. Particularly, the CAISO is concerned that because it is the only party with an established consulting agreement with GE Energy, the vendor selected to conduct the Planning Reserve Margin Study (PRM Study), strict application of Rules 10.3 and 10.4 may be infeasible.

¹ Rule 10.3 Computer Model Documentation:

- (a) Any party who sponsors testimony or exhibits which are based in whole, or in part, on a computer model shall provide to any party upon request the following information:
- (1) A description of the source of all input data;
 - (2) The complete set of input data (input file) used in the sponsoring party's computer run(s);
 - (3) Documentation sufficient for an experienced professional to understand the basic logical processes linking the input data to the output, including but not limited to a manual which includes:
 - (A) A complete list of variables (input record types), input record formats, and a description of how input files are created and data entered as used in the sponsoring party's computer model(s).
 - (B) A complete description of how the model operates and its logic. This description may make use of equations, algorithms, flow charts, or other descriptive techniques.
 - (C) A description of a diagnostics and output report formats as necessary to understand the model's operation.
 - (4) A complete set of output files relied on to prepare or support the testimony or exhibits; and
 - (5) A description of post-processing requirements of the model output.

The CAISO originally initiated a PRM (Planning Reserve Margin) stakeholder process in late November 2007 to review a preliminary study scope and proposals by potential vendors to perform a PRM study. In March of 2008, the CAISO announced that it had selected GE Energy to perform the PRM Study, and entered into a contract with GE Energy consistent with the preliminary study scope. Subsequently, on April 10,

(b) If a sponsoring party modifies its computer model or the data base, and sponsors the modified results in the proceeding, such party shall provide the modified model or data to any requesting party who has previously requested access to the original model or data base.

(c) Parties shall maintain copies of computer models and data bases in unmodified form until 90 days after the date of issuance of the Commission's last order or decision in the proceeding, including order or decision on application for rehearing, to the extent that those computer models and data bases continue to provide the basis, in whole or in part, for their showing.

² Rule 10.4 Computer Model and Data Base Access:

(a) Any party seeking access to a computer model or data base shall serve on the sponsoring party a written explanation of why it requests access to the information and how its request relates to its interest or position in the proceeding.

(b) Any sponsoring party shall provide timely and reasonable access to, and explanation of, that computer model or data base to all parties complying with subsection (a).

(c) If a party requests access to a data base, the sponsoring party may, at its election, either

- (1) provide such access on its own computer,
- (2) perform any data sorts requested by the requesting party,
- (3) make the data base available to the requesting party to run on the requesting party's own computer, or
- (4) make the data base available through an external computer service.

(d) If a party requests access to a computer model, the sponsoring party may, at its election, either

- (1) make the requested runs on its own computer,
- (2) make the model available to the requesting party to run on that party's own computer, or
- (3) have the requested model run produced for the requesting party by an external computer service.

(e) The sponsoring party is not required to modify its computer model or data base in order to accommodate a request, or to install its model on the requesting party's computer, or to provide detailed training on how to operate the model beyond provision of written documentation. The sponsoring party is not required to provide a remote terminal or other direct physical link to its computer for use by the requesting party. The sponsoring party may take reasonable precautions to preclude access to other software or data not applicable to the specific model or data base being used.

(f) Within five business days of receipt of a request from a requesting party pursuant to this rule, the sponsoring party shall indicate whether the request is clear and complete and shall provide the requesting party a written estimate of the date of completion of the response.

2008, the California Public Utilities Commission (Commission or CPUC) opened this proceeding “to review, and modify to the extent found to be appropriate, the Planning Reserve Margin (PRM) and the assumptions, methods, and procedures used for its determination.”³ As a result of the parallel PRM initiatives, the CAISO and the CPUC merged their PRM stakeholder processes, and are working collaboratively on the PRM Study, to determine the underlying study methodology and gather data needed to complete the PRM Study, which will provide the basis for the PRM established by the Commission in this proceeding. Given that the CAISO had already engaged GE Energy to perform the PRM Study as a consultant prior to the initiation of this proceeding, GE Energy continues to be responsible for conducting the study upon which the Commission will rely. Notwithstanding the collaborative arrangement between the CAISO and the Commission, the CAISO remains a party to the proceeding.

As noted, GE Energy continues to be responsible for conducting the study upon which the Commission will rely. Specifically, GE Energy will use seventy-two base and sensitivity cases and rely on its own proprietary Multi-Area Reliability Simulation program (MARS Model) to perform the PRM Study. Unique to this proceeding, however, is the fact that only the CAISO—a party—bears the costs associated with the services provided to the Commission by GE Energy. Moreover, the CAISO does not have a license agreement in place with GE Energy in order to run the MARS Model, and has provided for GE Energy to perform all seventy-two base and sensitivity cases necessary to complete the PRM study.

The agreement as entered into by the CAISO and GE Energy was not intended to facilitate a proceeding subject to Rules 10.3 and 10.4. The CAISO did not intend to bear

³ *Order Instituting Rulemaking* (OIR), issued April 16, 2008 in R. 08-04-012 at 17-18.

the cost of paying GE Energy to run an unlimited number of base and sensitivity cases through the MARS model in order to comply with discovery requests in a proceeding. In order for Rules 10.3 and 10.4 to strictly apply here, the CAISO's contract with GE Energy would have to be expanded, which is not necessarily an expense or commitment the CAISO is ready to make. Furthermore, the CAISO cannot at this time even comply with Rule 10.4 since it does not have proprietary rights to the MARS model, and does not have a license agreement with GE Energy. Thus, the scope of the agreement between the CAISO and GE Energy does not allow for the opportunity for Rules 10.3 and 10.4 to apply, without subjecting the CAISO to additional expense, or even placing the CAISO in a position to breach its agreement with GE Energy by divulging the MARS Model.

The CAISO submits that to the extent parties in this proceeding are willing to collaborate and reach agreement on the *seventy-two* base and sensitivity cases ultimately submitted to GE Energy, the CAISO is agreeable to jointly defining the variances that will populate the MARS Model. Moreover, to the extent parties request documentation of the MARS Model and agree to sign GE Energy's Proprietary Information Agreement, GE Energy has indicated to the CAISO that it is willing to provide the proprietary MARS manual. The MARS manual, consistent with Rule 10.3, provides documentation sufficient for an experienced professional to understand the basic logical processes linking the input data to the output. To the extent the Commission and parties wish to enter into their own agreement with GE Energy in order to obtain a license agreement in order to access the MARS Model, the CAISO does not object, and in fact encourages it as a possible solution in this proceeding.

The CAISO requests the Administrative Law Judge in this proceeding to recognize the unique circumstances faced by the CAISO given its consulting agreement with GE Energy and its collaborative relationship with the CPUC. The CAISO, consistent with Commission Rule of Practice and Procedure 1.2,⁴ seeks liberal construction of Rules 10.3 and 10.4, and submits that this proceeding would benefit from reaching practical solutions to allow parties access to the MARS Model, that otherwise may not necessarily conform to a strict application of Rules 10.3 and 10.4.

III. CONCLUSION

For the foregoing reasons, CAISO generally supports TURN's Motion for Adoption of a Protective Order, and looks forward to working with parties to ensure fair access to the MARS Model and the information relied on in this proceeding.

Respectfully submitted,

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August 11, 2008

⁴ Rule 1.2 Construction: "These rules shall be liberally construed to secure just, speedy, and inexpensive determination of the issues presented. In special cases and for good cause shown, the Commission may permit deviations from the rules."

CERTIFICATE OF SERVICE

I hereby certify that on August 11, 2008. I served on the parties listed on the service list of the following Docket Number R.08-04-012 by electronic mail, a copy of the foregoing Response of the California Independent System Operator Corporation to TURN's Motion for Adoption of Protective Order and Application of Rules 10.3 and 10.4

Executed on August 11, 2008 at Folsom,
California

/s/ Anna Pascuzzo

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