

February 10, 2003

Attn: Commission's Docket Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Docket # R.01-10-024, Order Instituting Rulemaking to Establish Policies and Cost Recovery Mechanisms for Generation Procurement and Renewable Resource Development

Dear Clerk:

Enclosed for filing please find an original and eight copies of the Comments of the California Independent System Operator Corporation on the Outlines of the Long-Term Procurement Plans of the Investor Owned Utilities in Docket # R. 01-10-024. Please date stamp one copy and return to California ISO in the self-addressed stamped envelope provided.

Thank you.

Sincerely,

Jeanne M. Solé
Regulatory Counsel

Cc: Attached Service List

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

Order Instituting Rulemaking to Establish
Policies and Cost Recovery Mechanisms
for Generation Procurement and
Renewable Resource Development

R.01-10-024

**COMMENTS OF THE CALIFORNIA INDEPENDENT
SYSTEM OPERATOR CORPORATION ON THE
OUTLINES OF LONG-TERM PROCUREMENT PLANS OF
THE INVESTOR OWNED UTILITIES**

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Dated: February 10, 2003

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In accordance with the California Public Utilities Commission’s (“CPUC” or “Commission”) decision D.02-10-062, the California Independent System Operator Corporation (“CA ISO”) respectfully submits its comments on the outlines of long-term procurement plans of the California Investor Owned Utilities (“IOUs”)¹. There are a number of good suggestions in the proposed outlines that the CA ISO supports as set forth herein. As a general matter, each of the IOU’s proposed outlines is both comprehensive and is consistent with the Commission’s desire for the development of integrated plans. Nonetheless, there are a number of issues that the outlines do not address explicitly or in sufficient detail. These comments identify those issues. In addition, these comments set forth a number of introductory thoughts regarding the structure of the proposed outlines.

I. Summary of comments.

¹ On February 6, 2003, the CA ISO filed a motion to intervene and to file initial comments in this matter.

The salient issues addressed by the CAISO in these comments are as follows:

- **The Need For Integrated Planning** – The CA ISO is fully supportive of the IOU’s proposal to take an integrated planning approach to the development of their long-term procurement plans, including an examination of all viable generation, transmission and demand-based procurement options. In addition, the CA ISO believes that the procurement process needs to be carefully integrated with the CA ISO’s own market design and grid planning efforts. In particular, the procurement rules should be consistent with the CA ISO’s applicable scheduling, resource commitment and deliverability rules. In addition, the procurement rulemaking should be coordinated with California Energy Commission’s efforts to develop a statewide Integrated Energy Policy Report.
- **The Need For Both a Long-Term and Short-Term Focus** – The CA ISO supports San Diego Gas & Electric Company’s proposal for developing long-range (20-year) as well as short-term (one-year) procurement plans. While the CA ISO believes there is great value in developing long-term plans that can provide a foundation for long-term strategic analysis and policy formation, the CA ISO also believes that a focus on short-term procurement activities is also essential. Market and operating conditions can change rapidly, thus it is imperative that short-term strategies be developed to address these changed circumstances.
- **The Need For Standardization** – The CA ISO urges the Commission to develop a standard target reserve level that will prevent inappropriate reliance by one Load Serving Entity on another’s reserves and that will enable a comparable assessment of each IOU’s procurement plans. To that end, the CA ISO also supports the standardization of load/growth and resource/hydro availability forecasting, energy and gas price assumptions, as well as other key variables.
- **The Need For Proper Incentives** – The CA ISO reiterates its recommendation that the Commission adopt clear ex-ante rules for compliance with the established procurement requirements. The CA ISO recommends that the Commission adopt penalties and/or sanctions for Load Serving Entities that fail to procure adequate capacity resources in the forward market.
- **The Need to Consider Regional Impacts** – The West is one market. The CA ISO recommends that the IOU’s plans more proactively consider the development of regional resources (both generation and transmission) and the role such resources may play in the procurement process.

- **The Need for Streamlined Transmission Planning and Siting** – The CA ISO supports Southern California Edison’s position that the Commission should streamline the siting process by deferring to the CA ISO’s determinations of need, avoiding duplicative planning processes, and terminating the AB 970 proceeding.
- **The Need for a Plant Repowering Policy** – The CA ISO urges that the Commission, along with its sister agencies, establish a clear and aggressive policy regarding plant repowering in California. Much of the state’s generating capacity is old and in need of repair either to keep running and/or to meet environmental regulations. This issue is of particular importance to the CA ISO because many of the older units are Reliability Must-Run generation and thus needed to maintain local area reliability.
- **The Need To Address Qualifying Facility Contracts** – Qualifying Facilities provide a significant portion of California’s generating capacity. The CA ISO understands that the power purchase agreements applicable to a large percentage of QF capacity are about to expire. The CA ISO urges the Commission to address this issue.

II. The long-term plans should address short and long-term needs, should incorporate consistent fundamental assumptions and sensitivities, should take account of the market structure, and should consider regional resources and needs.

The long-term procurement plan outlines of both San Diego Gas and Electric Company (“SDG&E”) and Pacific Gas and Electric Company (“PG&E”) note that while it is important to undertake a long-term planning process that considers needs and potential resources to meet these needs over a twenty (20) year planning horizon, it is also necessary to have a much more detailed and concrete plan for the procurement of resources in 2004. As stated in SDG&E’s filing, the Commission should “consider utilizing for individual years, and in particular for 2004, a process to approve a procurement plan that is separate from the long-term plan. This approach will be necessary because the long-term plan, as a guiding instrument, will not contain the specific short-term procurement requirements of the utility in any given year.”

The CA ISO agrees with this statement. The CA ISO is supportive of the CPUC's determination to require the IOUs to prepare comprehensive long-term plans with an extended planning horizon in order to set strategic direction and to identify reliability needs and to put into place resources to serve those needs before they become critical. Nonetheless, while it is important to develop a comprehensive, long-term plan and vision, it is also important to determine specifically the resources that will be available to serve load in the short to near-term such as in the following year. Accordingly, the CA ISO supports the suggestion by SDG&E that, concurrent with developing a long term plan, the utilities should on a yearly basis submit much more specific documents indicating how they will implement the plan in the following year and procure sufficient resources.

The CA ISO also agrees with both PG&E and SDG&E that it is important for the CPUC to consider and approve the yearly plans in time for them to be timely put into effect. Thus, the CA ISO supports the schedule set forth by SDG&E: annual detailed plans should be filed in early June so that the Commission can rule on them by mid September.

In addition, the CA ISO considers, upon reviewing the utilities' outlines, that it is necessary to have some consistency in approach, assumptions and sensitivity analyses among the utilities. For example, it could be difficult to assess the plans individually and in relation to each other if they contain markedly different assumptions about key inputs such as future load growth, energy prices, hydrological assumptions and other appropriate sensitivity analyses, etc. In addition, several of the plans discuss the need to coordinate the procurement process with the CA ISO grid planning process and the

California Energy Commission's ("CEC") Integrated Energy Policy Report ("IEPR") process. The CA ISO strongly concurs with the need for coordination and considers that this coordination may also facilitate some consistency among the IOU long-term procurement plans, as some standardization regarding key inputs is already taking place in the CA ISO grid planning and the IERP processes.

Further, PG&E's outline highlights the importance of understanding and accounting for the design of the wholesale and retail electricity markets, in which the IOUs must undertake their procurement activities. The CA ISO wholeheartedly agrees. In particular, the plans and the IOUs' procurement activities must account for the strong possibility that by the end of 2004, locational marginal pricing ("LMP") will be in place in the CA ISO's day-ahead and real-time wholesale electricity markets. The CA ISO's proposed market design should be considered and reflected in the structure and terms of any long-term contracts entered into pursuant to the rules established in this proceeding. Thus, among other things, the scheduling requirements under such long-term contracts should be compatible with the specific source-to-sink scheduling rules under the CA ISO's proposed LMP design. In addition, the availability and dispatch provisions of such contracts should be compatible with the structure and timing of the CA ISO's day-ahead scheduling and resource commitment procedures as well as the CA ISO's real-time dispatch protocols. In other words, the nature of the long-term contracts should be seamlessly integrated with the structure, timing and functioning of the CA ISO's proposed market design. Absent this integration, market anomalies and discontinuities will arise that may undermine the fundamental economics of both the long-term contracts and the CA ISO's markets.

Finally, there is little mention in the IOUs outlines of regional considerations. However, these are important in developing a robust, cost-effective, long-term plan. In many ways the West functions as a single broad market, with base-load resources spread across the West and connected to loads centers by long transmission lines. Moreover, inter-regional transmission lines are critical to facilitate the historic seasonal exchanges that occur between regions in the West. Accordingly, in developing comprehensive plans, it is important to incorporate an analysis of potential new resources that will likely be added in the Southwest and Mexico, the characteristics of the hydro resources that comprise a large component of the resources California relies on, and the transmission additions that are necessary to optimize the West-wide market.

By the same token, the long-term plans must accommodate, and accurately account for, reliance on potential imports as a means to satisfy long-term procurement requirements. There has been substantial controversy about the credit to be given to imports in determining resource adequacy. It is the CA ISO position that in order to be considered a viable firm resource, imports must be subject to some form of obligation to California (as opposed to their host control area), be it a contract or a right of first refusal, and must have firm transmission capacity available for delivery of the imports to the California interties.

In sum, the CA ISO supports the suggestion by SDG&E and PG&E that, in addition to a process to develop and update a comprehensive, long-term procurement plan, there is a need for annual short term plans setting forth in far greater specificity the resources that have been or will be secured to meet projected load in the coming year.

Further, the CA ISO observes the need for some consistency in approach, assumptions and sensitivities among the utilities and suggests that coordinating the procurement proceeding with the grid planning and IEPR efforts underway at the CA ISO and the CEC would facilitate such consistency. The CA ISO agrees with PG&E that the underlying market structure must be understood and accounted for. Finally, the CA ISO notes that a regional review must be a component of any long-term procurement plan by the IOUs and that the CPUC must establish an appropriate standard for counting imports in assessing resource adequacy.

III. Issues related to resource adequacy.

On February 6, 2003, the CA ISO filed comments in this proceeding setting forth some initial thoughts on the issues that impact resource adequacy and that should be addressed by the CPUC in this proceeding. In a nutshell, the CA ISO noted the importance of 1) establishing a minimum reserve level obligation at a level that assures that sufficient resources are available to meet projected load and operational reserve requirements; 2) establishing a methodology to determine how much of a particular resource can be counted for purposes of meeting load and reserve requirements; 3) addressing deliverability concerns; 4) having a process to monitor compliance with and reporting of minimum resource adequacy requirements; 5) putting into place incentives and/or penalties to encourage compliance. Rather than repeating those comments again in this pleading, the CA ISO refers the Commission to the February 6, 2003, filing which the CA ISO incorporates by reference herein.

All of the IOU outlines include some general mention of the need to address target reserve levels. The CA ISO is concerned, however, from reviewing the IOUs' proposed outlines, that each of the utilities may take a different approach to determining the proper amount of reserves it intends to obtain. The development and application of differing or inconsistent reserve criteria may undermine the Commission's goal of ensuring reliability, promote inappropriate reliance on the reserves of others, and will certainly complicate efforts to assess each IOU's procurement plans on an equal basis. The Commission should quickly move to establish common criteria and methodologies for use in developing and evaluating the IOU's long-term procurement plans and reserve requirements.

Further, the CA ISO concurs with SCE's comment that the Commission must assure that "resource adequacy requirements are equal for all Load Serving Entities." Otherwise Load Serving Entities can minimize their own costs by relying on the reserves of other Load Serving Entities. While the CPUC may not have jurisdiction to impose resource adequacy requirements on municipal utilities, it should ensure that consistent requirements apply to the IOUs. In addition, the CPUC should consider whether and how similar requirements can be imposed on Energy Service Providers ("ESPs"), to prevent ESP customers from leaning on the IOUs for reliable service.

While it will not repeat its February 6, 2003, comments herein wholesale, the CA ISO considers that one matter in particular bears reiteration. The CA ISO has advocated strongly for some form of monitoring and consequence to a failure on the part of Load Serving Entities to procure sufficient capacity prior to the day-ahead and real time energy markets to meet their expected load. The CA ISO had thought that this

issue could be discussed in the context of the development of a proposed incentive mechanism that is to be facilitated by SDG&E. The CA ISO intends to participate in the workshop hosted by SDG&E to address an incentive mechanism. From a brief conversation with SDG&E, it appears however that the issue of enforcement of the target reserve level/resource adequacy requirement may be better addressed separately. In either case, the CA ISO strongly advocates for the development and imposition of mechanisms, including incentives and penalties or sanctions, to ensure that Load Serving Entities procure, in the forward markets, sufficient capacity to meet their load and reserve responsibilities.

Finally, the CA ISO wishes to raise an important issue related to resource adequacy that is not described in the CA ISO's February 6, 2003 comments. This issue involves the availability of resources to the CA ISO in the day-ahead and real-time market timeframes. While currently, the Federal Energy Regulatory Commission ("FERC") has in place a must-offer obligation that requires generators to operate, if they are not otherwise committed and their output is required to meet projected load, it is uncertain for how long this requirement will remain in place. Moreover, generators regularly raise concerns about fair pricing for the must-offer obligation. Accordingly, the CA ISO considers that a resources' availability is best obtained through long-term procurement contracts. Thus, as the Commission develops and finalizes its long-term procurement rules, the CA ISO urges the Commission to ensure that resources procured pursuant to the rules are made available to the CA ISO in the day-ahead market for possible commitment to serve the next day's forecast load. While the CA ISO recognizes that this issue is complex and that any such process must appropriately

accommodate and use energy limited resources, the CA ISO is willing to work with the IOUs, resources and the CPUC to fashion an approach that is both fair and satisfies the CA ISO's reliability needs.

In sum, the IOU outlines do not address in sufficient detail the definition, monitoring and enforcement of a responsibility on the part of the IOUs to comply with a target reserve level.

IV. Issues related to transmission planning.

It is axiomatic to note that transmission is one of several fundamental categories of facilities/services that are required to reliably serve load. SCE sets forth a number of recommendations for the CPUC to facilitate investment in new transmission by removing barriers in its permitting process. The CA ISO agrees with SCE's recommendations. In particular, SCE recommends that: 1) the CPUC avoid duplicating the transmission project need assessments performed by the CA ISO; 2) the Commission comply with Pub. Util. Code § 399.25; 3) the CPUC close its AB970 proceeding, or only hold hearings if the results can and will be adopted in the project's separate G.O. 131/CPCN proceeding; and 4) the CPUC establish and adhere to firm deadlines for completing its review of transmission projects in the siting process. The CA ISO concurs that these recommendations will facilitate siting and will reduce an unnecessary and wasteful duplication of efforts between the CPUC and the CA ISO.

Moreover, it will be important to coordinate the CPUC's procurement process with the CA ISO's grid planning process. For example, the procurement process will develop important information about the resources that the CA ISO and the IOUs must

plan for in the CA ISO's grid planning process. Thus, in developing and reviewing procurement plans, it is important to pay attention to and seek to define the location of expected resources. In this way, the CA ISO, IOUs and the CPUC can consider whether there are adequate transmission facilities available to optimize the value of such resources and develop the information required in the transmission planning process to identify necessary additions.

Similarly, the procurement process should incorporate information from the CA ISO's grid planning process rather than seeking to duplicate the analysis. The CA ISO welcomes the CPUC's thoughts on how the CA ISO can best assist the CPUC on transmission planning matters so that the information developed in the grid planning process can be made available to the CPUC in this proceeding at the appropriate level of detail. A large volume of information is already available to interested stakeholders and the CPUC in the context of the CA ISO's grid planning process, but will need to be incorporated into the record in this case. Coordination is key.

V. Other issues of general concern.

The CA ISO seeks to highlight two further issues that are not adequately addressed in the IOUs' proposed outlines: 1) consideration of a retirement/repowering policy; and 2) consideration of the future of Qualifying Facility ("QF") contracts. Both these issues could significantly impact the resources that are available to meet California load in the short, mid and long term.

California's fleet of generating plants includes a significant proportion of plants over thirty years old. Meanwhile, air and water quality requirements have become

increasingly stringent. Thus, a significant proportion of generating plants may either have to retire or require significant additional investment because they currently are too inefficient to compete against newer units, or because they require significant capital additions to continue to meet environmental requirements. In several cases, important questions are raised about whether continued investment in old inefficient plants, or repowering, or additional new generation makes the most sense. Further, prudent planning cannot assume that these older units will remain on-line indefinitely.

The CA ISO is directly affected by these questions because it administers the reliability must run (“RMR”) agreements many of which relate to older, inefficient units. Unless new efficient generators replace these old plants, or unless transmission reinforcements are made, the CA ISO faces the potential of significant RMR cost increases, as RMR unit owners require the CA ISO to contribute towards capital additions necessary to comply with environmental requirements and/or opt for condition 2 status because they are unable to compete against newer more efficient plants. The CA ISO considers that by addressing this issue and developing a sensible repowering/retirement policy, the CPUC can in this proceeding assist the CA ISO to minimize RMR costs.

The CA ISO also believes that the CPUC should define a policy regarding existing and new QFs in this proceeding. There are 9 to 10,000 MWs of QF resources in California. The CA ISO is aware that the purchase power agreements (“PPA”) between the IOUs and a significant proportion of these QFs will expire over the coming several years. It is not certain whether and to what extent QF plants with expired PPAs will continue to operate. Thus it is important to fashion a sensible QF policy to ensure

that significant resources, especially in transmission constrained areas, are not lost without adequately planning for necessary local area reliability reinforcements, and to make sure that IOU procurement plans accurately reflect the level of QF generation that can be expected.

In sum, IOU long term procurement plans should address potential repowering/retirement issues and accurately assess the output that can be expected from QFs going forward. To help guide the IOUs in this matter, it would be helpful for the CPUC to fashion sensible policies as to these important issues.

VI. Conclusion.

The CA ISO respectfully suggests that a number of important issues should be added to the IOU long term procurement plans as described herein.

Date: February 10, 2003

Respectfully submitted,

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PROOF OF SERVICE

I hereby certify that on February 10, 2003, I served by electronic and U.S. mail, the Comments of the California Independent System Operator Corporation on the Outlines of the Long-Term Procurement Plans of the Investor Owned Utilities in Docket # R. 01-10-024.

DATED at Folsom, California on February 10, 2003.

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