

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

Order Instituting Rulemaking to Consider)	
Annual Revisions to Local Procurement)	R.08-01-025
Obligations and Refinements to the)	
Resource Adequacy Program)	
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**PHASE 2 JOINT PROPOSALS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION,
PACIFIC GAS AND ELECTRIC COMPANY, SAN DIEGO GAS AND ELECTRIC
COMPANY AND SOUTHERN CALIFORNIA EDISON COMPANY**

INTRODUCTION AND OVERVIEW

Pursuant to the Administrative Law Judge's October 30, 2008 Ruling Adopting Dates Certain For, And Making Changes To the Phase 2 Schedule, the California Independent System Operator ("CAISO"), Pacific Gas and Electric ("PG&E"), San Diego Gas and Electric ("SDG&E") and Southern California Edison Company ("SCE") -- referred to collectively as Joint Proponents -- hereby submit a joint proposal on the modification of Qualifying Capacity ("QC") counting rules for non-dispatchable Qualifying Facilities ("QFs"). The CAISO, PG&E, and SDG&E also submit herewith a proposal on the extension of the counting rule for new resources that was adopted in the CPUC's Phase 1 decision (D.08-06-031).

For the purpose of developing a joint proposal on modifying the counting rules for non-dispatchable QF resources as part of Phase 2 of the RA proceeding PG&E, SDG&E, SCE and the CAISO held several conference calls and exchanged ideas during the latter part of 2008. The Joint Proponents are

proposing a modification to the current process by which QC values are determined for non-dispatchable QFs. For ease of reference in this document, when the term QF is used it will refer only to those QF resources that are non-dispatchable.

SCE is not taking a position on the counting rule proposed herein for new resources.

I. QUALIFYING CAPACITY COUNTING RULE FOR QUALIFYING FACILITIES

A. Background

During Phase 1 of the RA proceeding, the CAISO and PG&E agreed there was a possibility that scheduled outages could be double counted if a QF resource reported a scheduled outage to the CAISO that exceeded the time threshold¹ in the RA program rules. In the Phase 1 final decision, the CPUC recognized the validity of the concern, but also wanted a more thorough analysis performed so that it could better understand the scope of the problem. In addition, the Phase 1 decision (D.08-06-031) adopted a cut-out for calculating QC values for dispatchable QF resources. Thus, this proposal is focused solely on non-dispatchable QFs.

¹ As taken from the 2009 RA Guide, page 11, the rule for RA resources with Schedule Outages is:

- 1) May through September – Scheduled outage exceeding 25% of days in the month the resource does not count for RA, for scheduled outages equal to or less than 25% there is no adjustment.
- 2) October through April – Scheduled outages less than 1 week, no adjustment is made to NQC, for scheduled outages 1-2 weeks the NQC is adjusted by the following formula
[1 – (days of scheduled outage/days in month) – 0.25] * NQC
For scheduled outages over 2 weeks the resource does not count towards RAR.

B. Issue

The concern with the counting rules for QF resources is that there is a possibility that the resource could be “double counted” for scheduled outages. The current CPUC QF counting rule takes an average output of these resources over a three-year period. Thus, the rule picks up any historical scheduled outages when calculating that average number. If a QF also reported a **scheduled** (not forced) outage to the CAISO during the operating year that was greater than the allowed period identified in footnote one, then the QF resource’s QC would be further reduced, thereby in effect “double counting” the scheduled outages. This could subject a Load Serving Entity (“LSE”) to additional procurement requirements if it caused the LSE to be deficient in meeting its RA requirement.

Based on discussions, Joint Proponents developed a preferred approach for addressing the issue;

Correct Historical Output – This was the CAISO proposal during Phase 1 of the RA proceeding. Under this proposal, the historic output values for all of the QFs would be adjusted to remove scheduled outages that met the CPUC criteria prior to calculating the QC. This approach maintained the requirement that LSEs would have to “make up” in their RA showings any QF- scheduled outages that reduced or eliminated any QC if such QC reductions caused the applicable LSE to be deficient in meeting its RA obligation. After further review of this proposal, Joint Proponents believe this approach is a valid way to

remove the double counting of scheduled outages, but there are some administrative concerns that need to be addressed.

C. Analysis Performed

For purposes of assessing the scope of the problem, the CAISO Outage Coordination group pulled outage data from 2007 and 2008 (2008 included all months except December). The CAISO also received a list of the resources that use the historic three-year average method to calculate the QC value from the CPUC. The list of QF resources consisted of 262 resources with a total 2009 NQC of 5194MW. No distinction was made and no analysis was done on whether the QFs were providing system RA or local RA capacity.

Next, the 2007 and 2008 outage data was filtered to include only scheduled outages on the 262 QF resources that met the scheduled outage counting criteria that would have resulted in a reduced RA availability amount. Forced outages were excluded because there is no RA adjustment needed for these outages. The table below reflects the outage MW impact for 2007 and 2008 by month for those QFs that may have had an RA replacement obligation under the CPUC's current rules. Any resource with an outage less than the RA criteria is not included in the table. If an outage extended across two or more months, and it met the minimum criteria for an RA adjustment, then the outage MWs were shown for each month. If a resource had a partial derate, the value reflected in the table below is just the curtailed MW, as long as it did not exceed the QC value.

	2007 Outage MW	2008 Outage MW
January	390.7	311.1
February	344.0	98.8
March	368.6	203.9
April	403.4	125.7
May	274.0	113.6
June	0	0
July	0	0
August	0	0
September	0	0
October	415.5	235.0
November	424.1	317.4
December	232.0	51.0

D. Joint Proposal for QF Counting Rule

To address the issue whereby a QF resource could have its QC (based on a simple three year average) further reduced due to a scheduled outage, and the LSE could also be required to replace RA capacity resulting from an effective double counting of the scheduled outage -- the Joint Proponents propose a modification to the current CPUC QC counting rule for QF resources.

Under the current CPUC rules for QFs, the QC is calculated by taking the past three years of historical output and generating a monthly average output. Because this data is based on historical output, it inherently takes into account scheduled outages (as well as forced outages). The current rules do not make any adjustment to the historical values; so, it is possible that the QC could have been further reduced during a scheduled outage in the operating year, and the LSE could have been required to procure replacement RA capacity if the scheduled outage met the CPUC criteria for procuring replacement RA capacity.

After reviewing the data and discussing various options, Joint Proponents concluded that the Historical Output Correction approach, described above, provided the best solution to resolving the issue of the double counting of scheduled outages for QFs whose QC is calculated based on three years of historical output. Joint Proponents do not believe that the additional burdens outweigh the benefits of a more accurate counting rule. At this time, the CAISO, CPUC and CEC are discussing the necessary administrative processes to implement this.

Joint Proponents propose that a process be developed to allow the CAISO to provide the CEC with data for the outages that exceed the CPUC threshold, as described in the RA Guide and footnote 1 of this document. This data would include, among other things, the resource ID and start and end dates of the scheduled/planned outage. Joint Proponents envision that this data would come from the CAISO's SLIC outage system. The CAISO and CEC would need to ensure that the necessary process is in place to provide this data to the CEC. From this data the CEC would be able to identify the hourly output data that needs to be adjusted. The parties propose that the hourly output data be replaced with a "proxy QF output" based on the output values for the same dates from the previous two years. The "proxy QF output" would be calculated by averaging the output values in the previous two years. This "proxy QF output" value would then be used as the historical value for the subsequent three-year average calculations. Once all values have been retrieved, the CEC would perform the same QC calculation process as is done under the current process.

The following example illustrates this proposal: Assume there is a QF that had a scheduled outage for the period March 7, 2008 through March 23, 2008. This outage limited the resource's output during the scheduled outage. For the purpose of this example, the table below reflects the output data for one day of the outage, but assumes that there is similar data for each day of the scheduled outage. In Table 1 below, the second to last column shows the 2009 NQC that would be calculated under the current rule, using the reduced output during the scheduled outage period. The current rules do not make any adjustment for the output during the prior year scheduled outage, so the reduced output is included in the average calculation. That initial 2009 NQC value is then subject to a further reduction during the 2009 operating year if the QF resource had a scheduled outage in 2009 identical to its outage in 2008. The last column of the table reflects the 2009 NQC that would be calculated under the proposed rule change. The output recorded during the 2008 scheduled outage period would be removed and replaced with a value derived by taking the hourly output from the previous two years and averaging these two values to come up with a replacement output for the hours of the scheduled outage. This replacement value would then be used in the three-year average calculation, with the new 2009 NQC subject to a reduction in the applicable LSE's RA compliance filing for any scheduled outages in the operating year that meet the CPUC's threshold.

Table 1

QF Counting Rule Example under Current CPUC and New Proposed Rule

Day	HE	2006 Historical Output	2007 Historical Output	2008 Historical Output	Revised 2008 Historical Output	2009 NQC Under Current CPUC Rule	2009 NQC Under Proposed Rule Change
7-Mar	1	50.0	53.0	16.0	51.5	39.7	51.5
7-Mar	2	51.0	54.0	15.0	52.5	40.0	52.5
7-Mar	3	50.0	52.0	17.0	51.0	39.7	51.0
7-Mar	4	52.0	50.0	16.0	51.0	39.3	51.0
7-Mar	5	55.0	53.0	17.0	54.0	41.7	54.0
7-Mar	6	60.0	63.0	18.0	61.5	47.0	61.5
7-Mar	7	70.0	65.0	16.0	67.5	50.3	67.5
7-Mar	8	71.0	70.0	17.0	70.5	52.7	70.5
7-Mar	9	72.0	75.0	18.0	73.5	55.0	73.5
7-Mar	10	72.0	74.0	17.0	73.0	54.3	73.0
7-Mar	11	74.0	72.0	16.0	73.0	54.0	73.0
7-Mar	12	74.0	73.0	20.0	73.5	55.7	73.5
7-Mar	13	75.0	77.0	19.0	76.0	57.0	76.0
7-Mar	14	74.0	76.0	18.0	75.0	56.0	75.0
7-Mar	15	76.0	72.0	19.0	74.0	55.7	74.0
7-Mar	16	75.0	73.0	19.0	74.0	55.7	74.0
7-Mar	17	75.0	78.0	18.0	76.5	57.0	76.5
7-Mar	18	74.0	75.0	20.0	74.5	56.3	74.5
7-Mar	19	70.0	73.0	19.0	71.5	54.0	71.5
7-Mar	20	68.0	69.0	18.0	68.5	51.7	68.5
7-Mar	21	65.0	67.0	19.0	66.0	50.3	66.0
7-Mar	22	63.0	65.0	18.0	64.0	48.7	64.0
7-Mar	23	60.0	62.0	18.0	61.0	46.7	61.0
7-Mar	24	58.0	59.0	18.0	58.5	45.0	58.5

As the example illustrates, the proposed change to the QF counting rules would allow a QF resource to have its QC value adjusted to a value that more closely resembles its historical output, but would still retain the requirement that

LSEs procure the necessary replacement RA capacity should the resource be unavailable and the reduced QC cause the LSE to be deficient in its RA obligation.

In summary, the Joint Proponents are proposing a revised counting method that eliminates the double counting concern but retains the obligation for LSEs to replace capacity under the current CPUC RA program rules. The revised counting method effectively assumes that the QF resource would have operated at the level seen in the previous years if it were not for the scheduled outage. This assumed operational level is then used in the calculation of the three year average output for QF resources to determine their QC.

II. PROPOSAL TO EXTEND INTERIM COUNTING RULE FOR NEW RESOURCES

In the latter stages of Phase 1, PG&E proposed that new resources should be counted toward local RA obligations in the year-ahead demonstration if the LSE demonstrates local procurement sufficient to cover the obligation in the months preceding the expected commercial operational date (“COD”) of the new resource. For example, a LSE could count a new resource with a March COD in its year-ahead demonstration, as long as it could show a short-term contract with an existing unit for the bridge months from January to March. The PG&E approach allows the LSE to substitute a new resource and avoid a long-term contract with an existing unit when the new resource's COD falls after the

October 31st RA filing deadline. Several parties, including SDG&E, WPTF and the CAISO, supported the PG&E approach.

In its Phase 1 Decision (D.08-06-031), the Commission adopted the PG&E approach for counting new resources, with two limitations. First, the Commission required that an LSE who relies on a new resource that is not commercially operational prior to its final annual local RA compliance showing must, in its showing, (a) claim the entire new resource, and (b) specify a single local unit that it will show on every monthly filing to make up the capacity until the new unit has reached commercial operational status. The second limitation the Commission adopted was temporal: the revised methodology for counting new resources only applied to the 2009 reporting year.

Unless a more durable solution emerges during the Phase 2 and workshops, the CAISO, PG&E and SDG&E propose that the Commission adopt the PG&E approach until such time as a better approach is identified and adopted. SCE does not take a position on this proposal. Although it is not a perfect fix, the PG&E approach works a service to ratepayers by avoiding the costly over procurement that invariably occurs when a new resource achieves COD after the annual RA demonstration. Furthermore, because the LSE must acquire sufficient local capacity to meet its local capacity requirement, and maintain that capacity until the new resource comes on line, there is no risk to system reliability or need for the CAISO to engage in backstop procurement.

Because this interim revision saves ratepayers money without having any adverse effects on reliability, Joint Proponents with the exception of SCE, ask the

Commission to accept the amended rule for counting new resources adopted in D.08-06-031 as a permanent amendment to the CPUC's RA counting rules.

III. CONCLUSION

For the foregoing reasons, the CAISO, PG&E, SDG&E and SCE respectfully request that the Presiding Administrative Law Judge prepare a proposed decision for Commission consideration that incorporates the proposals articulated herein.

Respectfully submitted,

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Date: January 9, 2009

CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2009. I served, by electronic mail and United States mail, a copy of Phase II Proposals of the California Independent System Operator Corporation to each party in Docket No. R.08-01-025.

Executed on January 9, 2009 at
Folsom, California

/s/ Anna Pascuzzo //

Anna Pascuzzo,
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