

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

Order Instituting Rulemaking to Consider)	
Refinements to and Further Development of the)	R.05-12-013
Commission's Resource Adequacy)	
Requirements Program)	
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**REPLY COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION
ON DRAFT OPINION ON REMAINING PHASE 1 ISSUES**

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Dated: July 17, 2006

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In accordance with Rule 77.5 of the Commission’s Rules of Practice and Procedure, the California Independent System Operator Corporation (“CAISO”) respectfully submits its reply to opening comments on Administrative Law Judge (“ALJ”) Wetzell’s draft decision entitled “Opinion on Remaining Phase 1 Issues,” mailed June 20, 2006, in the above-referenced proceeding (“Draft Decision”).

A. Compliance with CAISO Availability Requirements

Several parties, including PG&E, SCE, and Constellation, note that it is unnecessary and undesirable to specify the particular requirements of the CAISO’s tariff with respect to generating unit commitment and dispatch that must be incorporated into the standard capacity product. The CAISO agrees. The Commission should modify Category Three language consistent with the specific recommendations of PG&E and SCE.

B. Western Power Trading Forum (“WPTF”)

1. The Commission Should Reject WPTF’s Suggested Modification to Calculating Qualifying Capacity During a Scheduled Outage

WPTF correctly states that the adoption of a monthly peak resource adequacy requirement, rather than a seasonal or annual obligation, necessarily compels that resources be discounted when unavailable due to scheduled outages. The CAISO has similarly observed that the Commission’s adopted planning reserve margin fails to account for planned outages and therefore counting resources known to be unavailable during scheduled maintenance contravenes the underlying goal of resource adequacy of ensuring that sufficient resources are available when and where needed to meet system reliability. Notwithstanding the CAISO’s opposition to the

treatment of units on scheduled outage, the CAISO believes that the formula set forth in the Draft Decision is superior to the “availability factor” approach advanced by WPTF. WPTF’s approach would exacerbate reliance on “phantom” capacity. Under the Draft Decision’s formula, a lengthy scheduled outage triggers a full replacement obligation. However, WPTF’s availability factor approach would allow a resource to count for most of its Qualifying Capacity even if entirely unavailable during a particular compliance month. The CAISO is cognizant of the commercial risk associated with moving scheduled outages and will attempt to balance the need for commercial stability with its obligation to reliably operate the system when approving and modifying scheduled outage requests.

2. WPTF’s Concern Regarding “Double Counting” Highlights the Problems With Firm Energy Contracts

WPTF states that Category Four exposes generators to accusations of violating the prohibition against “double-counting” of capacity even if the double sale occurs without the knowledge of the generator as a result of supplying energy to fulfill a liquidated damages contract. While the CAISO agrees that double-counting of capacity will occur under this circumstance, the Commission’s express acceptance of liquidated damages contracts sanctions this behavior and should itself mitigate the regulatory risk of a generator. The fact is that the Commission’s counting rules will prevent the discounting of such double-sold capacity because the liquidated damages contract need not identify the underlying resource. Accordingly, the CAISO disagrees that “knowledge” needs to be established, through a potentially lengthy investigative process, to assign replacement risk. However, the CAISO agrees with WPTF that an entity should be provided the opportunity to respond or participate in an investigation prior to imposing any financial liability or penalty. This is consistent with the CAISO’s existing Enforcement Protocol (CAISO Tariff § 37.8).

C. PowerEx

PowerEx asserts that the development of a viable capacity product requires that the Commission give more immediate consideration to the issue of “countability” and work with the CAISO to develop procedures that will preclude overselling of Net Qualifying Capacity. PowerEx suggests pursuing a mechanism similar to the Inter-Scheduling Coordinator Trading procedures included in the CAISO Tariff. The CAISO supports development of tools, whether an electronic bulletin board or otherwise, to facilitate trading and ensuring clean title to the transferred capacity. However, the record in this proceeding is not sufficiently developed to

permit selection of a preferred mechanism and the Commission should explicitly take up this issue in Phase 2.

D. Pacific Gas and Electric Company

1. For the Interim Period Resource Adequacy Products Should Have a Minimum Term of One Month

PG&E contends that the Commission should eliminate the requirement that resource adequacy products have a “time interval of one month.” The CAISO understands PG&E concerns regarding procurement flexibility; however, the CAISO’s current systems and procedures are unable to accommodate a wholly undefined term for the resource adequacy product. Whether or not a generating unit is under a resource adequacy contract will drive dispatch and commitment determinations performed by CAISO operations. To currently allow contracts of less than a month would inject additional complexity and require modifications to both the CAISO’s operation systems as well as settlement systems. These modifications would take time and given that the current CAISO systems are “interim” - effective only until MRTU is implemented in November 2007 - the value of forcing these changes is questionable. Accordingly, the CAISO recommends that the monthly term requirement be maintained at this time.

2. PG&E’s Comments on Deliverability are Misplaced

PG&E requests that the resource adequacy product only needs to be deliverable in the months that it is designated. As a general matter, PG&E is correct that a resource’s deliverability in the month’s it is not designated by an LSE is irrelevant. However, the CAISO notes that PG&E’s comments reflect a misunderstanding of the CAISO’s deliverability analysis. The CAISO’s deliverability assessment of internal generation evaluates the ability of the resource to deliver its output to load during peak demand conditions. A resource, therefore, will not be deliverable in certain months, but not others. Rather, the resource will have a level of deliverability that remains constant throughout the year.

3. The Draft Decision Cannot Dictate How Costs of CAISO Procurement Are Allocated

PG&E requests that the Draft Decision state that if the CAISO is required to procure additional local generation because the replacement unit in the local area is not as effective as the original unit, the additional CAISO costs should be borne by the generator. To the extent PG&E’s suggestion is an attempt to allocate the risk of additional procurement bilaterally, the

CAISO believes this is a matter for the parties. However, to the extent, PG&E is attempting to dictate how the CAISO bills market participants for capacity procured pursuant to CAISO backstop authority, the CAISO submits that this is not the correct forum.

E. Southern California Edison Company

1. The Commission Should Maintain for the Near Term the Requirement that the Standard Product Apply to a Single Generating Unit

SCE contests the limitation in the Draft Decision that a resource adequacy product "... is always written for a single generating unit." SCE argues that the ability to pool a portfolio of assets provides the seller the ability to better manage risk. The CAISO agrees and has noted its willingness to consider accepting portfolio resource adequacy resources in the context of its future MRTU design changes. However, as the CAISO has previously explained, and the Commission has acknowledged, prior to the implementation of MRTU, the CAISO cannot readily support a pooling of capacity assets. Under the CAISO's current resource adequacy offer waiver denial process, the offer to commit a resource must be known in advance and must apply to an entire, specific unit. Thus, the CAISO believes SCE's suggested modification to item 4b of Category One should be rejected.

2. Timing of Scheduling Issues

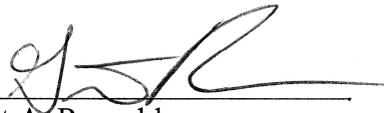
SCE notes that the CAISO may not "approve" a requested scheduled outage following the annual outage requests in October of each year, but instead may deem the request "pending." At some point in the future, when the CAISO's needs become more apparent, the request is likely to be approved. However, as the CAISO noted earlier, it strongly believes that capacity unavailable due to a scheduled outage should not count towards meeting an LSE's planning reserve margin and must be replaced. Yet, the CAISO also notes that absent a liquid capacity market, replacing unavailable capacity may require time. Accordingly, the CAISO believes the Draft Decision should be clear that any CAISO "approval" of a scheduled outage at least 60 days prior to the date of the month-ahead showing would trigger the thresholds established in Section 3.1 of the Draft Decision.

F. Cogeneration Association of California

CAC claims that "the Category 3 elements may effectively limit the ability of a generator to obtain adequate compensation." According to CAC, Category Three does this by requiring "generating units make their underlying RA capacity available to the CAISO at all times and apparently regardless of an acceptable price." CAC appears to misunderstand the CAISO Tariff. Under the CAISO's current Interim Reliability Requirements Tariff, if a resource adequacy

resource is unscheduled in the Day-Ahead Market, that resource must make itself available for commitment by the CAISO and submit real-time supplemental energy bids if committed. The bid is subject to the CAISO's general bidding requirements. Similarly, under MRTU, a resource not scheduled in the Integrated Forward Market, must make itself available to the CAISO through the Residual Unit Commitment process. Again, the resource's submitted energy or ancillary services bids are limited only by generally applicable bidding rules. In other words, the seller has the ability to ensure that its bids are compensatory based on the contribution to fixed costs received under its resource adequacy contract or arrangement. Thus, CAC's concerns may be disregarded.

Respectfully submitted,

By: 
Grant A. Rosenblum

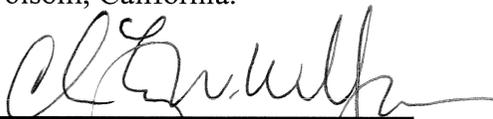
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Dated: July 17, 2006

CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic and United States mail, Reply Comments of The California Independent System Operator Corporation on Draft Opinion on Remaining Phase 1 Issues in Docket No. R.05-12-013.

Executed on July 17, 2006, at Folsom, California.

A handwritten signature in black ink, appearing to read "Charity N. Wilson", written over a horizontal line.

Charity N. Wilson
An Employee of the California
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