

**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 THE MAY 30, 2006  
DRAFT DECISION**

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Dated: June 26, 2006

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In accordance with Rules 77.2, 77.3 and 77.4 of the Commission's Rules of Practice and Procedure, the California Independent System Operator Corporation ("CAISO") respectfully submits its reply comments on Administrative Law Judge ("ALJ") Wetzell's draft decision entitled "Opinion on Local Resource Adequacy Requirements," mailed May 30, 2006, in the above-referenced proceeding ("Draft Decision").

Many of the comments filed on June 19, 2006 by the active parties to this proceeding were surprisingly similar, both in their praise for the Draft Decision and in areas of concern. From that standpoint, it appears that there are certain topics that should be revisited and the CAISO urges the Commission to adopt the modifications recommended in its initial comments. The purpose of these reply comments is to highlight some areas of agreement and respond briefly to several other items.

**I. THE DRAFT DECISION SHOULD BE MODIFIED TO  
ELIMINATE THE AGGREGATION OF LOCAL AREAS WITHIN  
PG&E'S SERVICE TERRITORY.**

In its initial comments, the CAISO strongly recommended against the aggregation of local areas within the PG&E service territory as a market power mitigation tool, or, as an alternative, aggregation for the 2007 procurement cycle only. This recommendation, in one form or another, was echoed by many of the parties representing diverse interests: Calpine, Constellation, TURN, PG&E, IEP, Mirant and AreM (supporting the

elimination of the 50% cap on the Greater Bay Area (GBA) procurement). These parties consistently noted, as did the CAISO, that aggregation could undermine the fundamental purpose of the local LCR study, thereby increasing, rather than decreasing, reliance on backstop procurement in deficient load pockets, and that the waiver process provided a sufficient mechanism for addressing market power. Even TURN, who proposed the 50% cap on procurement in the GBA as a compromise, has now stated that, based on further information and analysis, this cap will not be necessary for 2007 and aggregation should be avoided thereafter. The CAISO agrees and urges the Commission to follow the preferable and well-supported course of action—to reject the Staff’s aggregation proposal outright.

**II. THE \$40 PER KW-YEAR WAIVER “TRIGGER” SHOULD BE MODIFIED.**

The CAISO supports the use of a penalty waiver process, on an interim basis until the development of a functioning capacity market, as a means by which to address market power in load pockets. However, the CAISO expressed concern that the \$40 per kW-year derived calculation for RCST backstop was not an appropriate “trigger” to be adopted for all waiver requests, and that such requests should be individually evaluated to determine whether the costs of capacity in a particular area were actually higher than this threshold level. Similar concerns that \$40 per kW-year is too low and will set an unrealistic ceiling price on contract negotiations were expressed by Aglet, CAC, Calpine, Constellation, Mirant, NRG and IEP. Of further note, SCE requested clarification that \$40 per kW-year is not a bundled price but is for RA capacity only, and that the cost for the bundled capacity and energy product would be in the range of the \$73 per kW-year used in the IEP settlement. (SCE Comments, 7-8) Additionally, AReM and SCE suggested that the inability of LSEs to obtain reasonable contractual terms and conditions could also be a valid basis for seeking a waiver. A consistent theme among the parties commenting on this issue is that the Commission should approach the establishment of a waiver “trigger” with great caution, and should consider analyzing all requests on a case-by-case basis. Given the similarity of recommendations on this issue, the Commission should, at a minimum, modify the Draft Decision to reflect that \$40 per kW-year is not a set threshold above which penalty waivers will be automatically granted. The CAISO

provided proposed language that would serve this purpose in Appendix A attached to its comments.

**III. CAPACITY DEFICIENCIES IN THE LOAD POCKETS SHOULD NOT BE ADJUSTED.**

Another item of particular concern to the CAISO is the language of the Draft Decision at pages 21-22 wherein, for the purposes of determining the LSEs local procurement obligations, the Staff is directed to calculate reduced LCRs for those areas in which the 2007 LCR study identified deficiencies. Rather than undercut the purpose of the study by engaging in this exercise, the CAISO offered a compromise approach that would not involve reducing the deficiencies. The CAISO approach instead focused on exempting LSEs who were not able to meet their procurement obligations in these areas from Commission-imposed penalties as long as all available capacity was procured.

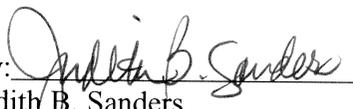
Constellation, Mirant and IEP also objected to this recalculation of the LCR study results. The CAISO agrees with Constellation's observation that artificially reducing procurement requirements before the compliance process begins will completely blunt the signal that should be conveyed to the market- that new generation is needed in a particular location. The Draft Decision should be modified to eliminate this undesirable result.

**IV. RESOURCES LOCATED OUTSIDE OF LOCAL AREAS SHOULD NOT BE INCLUDED AS QUALIFYING CAPACITY TO MEET RA OBLIGATIONS IN THAT AREA.**

At pages 6-8 of its comments, TURN urges the Commission to modify the Draft Decision and add the Moss Landing generator unit to the list of available resources to meet local procurement obligations within the Greater Bay Area. (Draft Decision, 54-57). The CAISO submits that the Commission should not change course on this issue, for the reasons set forth in its April 21, 2006 comments that were largely adopted in the Draft Decision. Indeed, the Draft Decision correctly noted the Staff's (and the CAISO's) concerns that the multiple complexities surrounding the use of effectiveness factors for determining the availability of resources outside the local areas adds administrative complications to the implementation of the 2007 LCR study results. TURN seems to have little to add to this discussion except to note that the CAISO, in its *2007 Reliability*

*Must-Run Technical Study of the ISO-Controlled Grid*, indicated that Moss Landing would be eligible for Greater Bay Area RMR purposes, if effective and eligible. (TURN comments, 7). However, these observations are perfectly consistent with the CAISO's April 21 comments, wherein it was noted that all RA designated resources, both inside and outside of the local areas, will be considered for backstop procurement purposes. The Commission should not accept the TURN recommendations in this regard, and should continue to support the establishment of defined area boundaries for the purposes of determining resources eligible for meeting local area procurement obligations.

Respectfully submitted,

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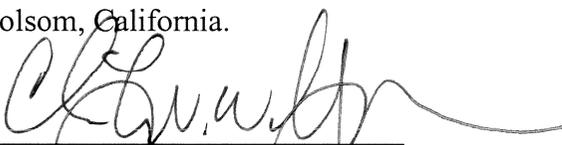
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Dated: June 26, 2006

## 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 the May 30, 2006 Draft Decision in Docket No. R.05-12-013.

Executed on June 26, 2006, at Folsom, California.



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