BEFORE THE
PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Consider Refinements to and Further Development of the Commission's Resource Adequacy Requirements Program	)))))	R.05-12-013

COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION REGARDING PHASE 1 TOPICS OUTLINED IN COMMISSIONER PEEVEY'S RULING AND SCOPING MEMO

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The California Independent System Operator Corporation ("CAISO") respectfully submits its comments on Phase 1 topics outlined in Commissioner Peevey's Ruling and Scoping Memo, mailed March 1, 2006, and in accordance with Order Instituting Rulemaking R.05-12-013, filed December 15, 2005.

I. Introduction

The CAISO appreciates the opportunity to comment on the Phase 1 RAR program elements that will be considered by this Commission. The CAISO understands the Commission's approach of dividing the RAR program elements into two phases.
In its comments, the CAISO addresses the Phase 1 topics as specified by the Scoping Memo. Specifically, the CAISO addresses (1) its clarification of key elements in the filed local RAR proposals and identifies, where appropriate, areas of agreement; (2) the need and benefits of a tradable capacity product that satisfy the CAISO's operational and reliability needs; (3) support for a compliance penalty while acknowledging the challenge small LSEs may face in procuring capacity; (4) the CAISO's goal to make the 2007 LCR Study results transparent and, therefore, the need for evidentiary hearings of the LCR

Study moot; and finally (5) the practical barriers and challenges in accommodating local RAR waivers.

II. Discussion

A. Local RAR Proposals

The CAISO generally agrees with several elements included in the submitted proposals. Here, the CAISO identifies those areas of agreement and clarifies or offers an alternative perspective, where appropriate. The CAISO generally supports the five step local RAR annual cycle outlined in the joint IOU Local RAR proposal ("IOU Proposal")[1] and, therefore, will focus our comments primarily on this part of the IOU Proposal.

1. Defining the Local Areas and Their Needs

As specified in the IOU Proposal, the CAISO absolutely agrees that future LCR Studies must be part of the Grid Planning Process, and specifically the Annual Transmission Expansion Planning Process. The CAISO believes the first step in the RAR determination cycle is for the CAISO to timely provide the Commission with the LCR Study results based on agreed to study input assumptions and inclusion of suitable PTO-supplied transmission solutions that have been identified through the Grid Planning Process. To aide the Commission in its decision-making process, the CAISO proposes to continue providing the Commission with the LCR results based on NERC Performance Level Criteria- B and C[2] The CAISO believes this approach is essential to fully inform

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[1] See Joint Proposal of Pacific Gas and Electric Company (U 39 E), San Diego Gas and Electric Company (U 902 E) and Southern California Edison Company (U 338 E) on Local Resource Adequacy Requirements, p. 3.

[2] Transmission system reliability studies evaluate system impacts due to the loss of one (N-1) or two (N-1-1 as well as N-2) elements in the transmission system under peak generation and load conditions. The CAISO proposes to continue to evaluate the system based on NERC Performance Level B (N-1) and Performance Level C (N-1 as well as N-2) contingency criterion as well as consideration of other contingencies for evaluation of path limit mitigation in its LCR Studies.

the Commission on the relative risks to the service reliability of load contained in the load pockets if the level of capacity required by NERC Performance Criteria- B becomes the level of procurement responsibility proscribed by the RA obligations.

Also in alignment with the IOU Proposal, once the CAISO incorporates the LCR Study into the Annual Transmission Expansion Planning Process, the CAISO can anticipate changes to local areas and show adjustments to the LCR over a multi-year planning horizon. Doing so will allow the PTOs to identify and implement cost-effective infrastructure improvements that have longer-lead times and help minimize reliance on local mechanisms or non-market solutions, while providing sufficient forward certainty to encourage long-term contracting.

2. Allocation of Procurement Responsibilities

At some point, the CAISO may accept a LCR allocation methodology between CPUC and non-CPUC jurisdictional LSEs based on a proportionate share of the forecasted peak load in each load pocket provided the load share can be provided in an undisputed and non-discriminatory way. However, to implement such an allocation methodology, the Commission would first need to develop a load reporting and, or forecasting mechanism to sufficiently and undisputedly determine the load served by the respective LSEs in each load pocket. Yet, one challenge in developing such a mechanism is the Commission does not have the authority to require all LSEs within the load pockets to provide this data. Therefore, because of data challenges and other technical constraints involved in apportioning load within the load pockets, the CAISO would modify the

IOU's proposed LCR allocation methodology between CPUC and non-jurisdictional entities.[3]

The CAISO proposes aggregating the California Energy Commission forecasts of LSE-specific contributions to the annual peak load (or, if such a forecast is unavailable for an LSE, the LSE's actual peak load in each Transmission Access Charge area[4] ("TAC Area")) to determine each LSE's percentage of load in a TAC area. The CAISO would then apply the resulting percentage of load to the aggregate LCR in a TAC area identified in the relevant LCR Study to determine the LSE's proportionate share of the LCR. The CAISO could then provide the Commission with the proportionate share of the LCR for the CPUC-jurisdictional LSEs. The CPUC could then allocate the LCR to each of the LSEs within its jurisdiction as it deems appropriate. Consistent with its role to plan and operate the grid, it is appropriate for the CAISO to allocate LCR for non-CPUC jurisdictional LSEs. Ultimately, it will be critical that the Commission and other LRAs adopt allocation methodologies and procurement requirements that ensure the LCR is satisfied in each of the load pockets such that CAISO backstop procurement is unnecessary, or at worst, minimal.

3. CAISO Evaluation and Backstop Procurement

The CAISO supports the dialog in the workshops that envision an annual procurement and showing for the LCR needs. The CAISO concurs with the IOU proposal that it would validate whether the resources identified by CPUC and non-CPUC

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[3] See *Joint Proposal*, p. 3.

[4] The term "TAC Area" was established in connection with the CAISO Transmission Access Charge. The term is used here because the TAC Areas are coterminus with the service areas of the Original Participating TOs (Pacific Gas & Electric, Southern California Edison, and San Diego Gas & Electric) as they existed prior to the addition of any new PTO or, in other words, the former Control Areas of the PTOs (further defined in CAISO Tariff Appendix F, Schedule 3).

jurisdictional entities satisfied the LCR as specified in the relevant LCR Study. Based on this evaluation, the CAISO would then rely on its backstop procurement authority to procure any residual capacity to meet the LCR once the CPUC and other LRAs have submitted their final LCR showings. Hopefully the Commission and other LRA policies are such that CAISO backstop procurement is unnecessary or, at worst, minimal.

The IOU Proposal suggests that RMR Condition 1 units should count toward reducing the need in local areas.[5] The CAISO cannot support this recommendation without qualification. The CAISO has consistently reminded stakeholders that RMR resources are not equivalent to RA resources. This stems from the fact that RMR resources are only available to the CAISO for specific operational needs and have certain dispatch restrictions. Given the limited dispatch rights secured by the CAISO through the RMR contract, such resources should not automatically count as complying with an LSE's overall planning reserve margin. Accordingly, RMR Condition 1 units should count as meeting system RA needs only if an LSE enters into a separate RA contract with an RMR Condition 1 resource.

4. Application and Interpretation of Reliability Standards

The CAISO concurs with the IOU proposal that the Grid Planning Standards used by the CAISO are standards well established by NERC and WECC and are, therefore, accepted and understood by the industry. The CAISO understands the balance between cost and reliability, and is, therefore, supportive of suitable operational non-generation solutions proposed by the PTOs that can meet the Grid Planning Standards and minimize the need for strict procurement of generation capacity to satisfy the LCR.

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[5] See *Joint Proposal*, footnote 1, p. 5.

However, the CAISO cautions the Commission to reject any policy or standard that would counter the laudable goal of "resource adequacy" and erode grid reliability. The CAISO's concern is that adopting a low standard and, or over-relying on operational schemes that incorporate load shedding is counter-productive politically, difficult to explain to the public, and likely, very costly based on the value of the loss of load (public safety, lost wages, productivity, etc.). In other words, load-shedding schemes may play an important role in limited-circumstances; however, load shedding should never be a casual option. To this end, the CAISO intends to provide sufficient details and guidance in its LCR Studies to help the Commission strike this balance and confidently make the appropriate decision regarding the robustness of the grid.

Albeit not mentioned in the local RAR proposals, the CAISO would like to point out to the Commission that an important component to local area reliability is consideration of the overall resource mix in the load pockets, including the type of resources that can start within the time that operating standards allow operation within the emergency ratings of transmission facilities. For instance, having quick-start capable resources in transmission-constrained load pockets can help prevent load shedding as a result of a contingency while avoiding having uneconomic long-start units on-line to provide system protection. If quick start capable units are available in the load pockets, then commitment of long-start units could be avoided and potential costs reduced or eliminated.

5. The Importance of a Single Process To Identify Grid Needs

The CAISO appreciates and fully supports the viewpoint expressed in the IOU Proposal that, "The Grid Planning Process is the established and accepted process for

evaluating the state of the grid and of transmission upgrades. The seamless integration of the Grid Planning Process with the determination of local areas and their needs, consistent with the Commission's guidance, will ensure efficient and effective evaluation of the future of the grid and avoid the conflict and confusion of duplicative and potentially divergent forecasts."[6] Additionally, through this process, the CAISO can anticipate changes to local areas and show adjustments to the LCR over a multi-year planning horizon, and by doing so allow the PTOs to identify and implement cost-effective grid solutions that may have longer-lead times than just one or two years. Also, by evaluating the grid over a longer time horizon, the CAISO can promote stability in the LCR requirements that facilitates longer-term contracting.

6. Establishing Local RAR Only If Certain Criteria Met

The AReM proposal would establish an LCR in a load pocket only if the following criteria have been met:

- The generation option is cost-effective
- Creditworthy counter-parties are available
- Generation is available for purchase by LSEs
- Market power cannot be exercised

The CAISO believes each of these points have merit and should be given consideration by the Commission in its development of an effective RAR program. However, the CAISO cannot accept the notion that the Commission would dismiss a LCR in a load pocket just because a set of criteria has not been met.

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[6] Id., p. 20.

The transmission constraints that drive the LCR in a load pocket are real and not based on economic circumstances related to the local area. Since it is the underlying physics of the integrated electric system that are driving these needs. Thus, they can't be ignored and must be met with appropriate and cost-effective resources, be it transmission, generation, demand response or operational solutions. The CAISO does not believe such load pockets should be left to the CAISO and its backstop role until "conditions are met." Rather, the CAISO believes that the underlying concerns that drive the criteria like market power, creditworthiness, etc., should be addressed proactively by this Commission so that LSEs can confidently procure their share of the LCR. Indeed, if it were required to prove the negative that market power could not be exercised in a load pocket, it is probable that no load pocket would satisfy AReM's proposed criteria.

B. Tradable Capacity Product

As we move forward with a resource adequacy requirement, it is essential to a regulatory framework that is conducive to products that provide LSEs the ability to efficiently acquire capacity from physical resources regardless of the LSE's size or capacity need. With the Commission providing clarity regarding the obligations of buyers and sellers of RA capacity and the CAISO communicating its operational needs and requirements to meet reliability, the CAISO believes a standard, readily tradable capacity product is a feasible and timely solution that can benefit LSEs. Efforts to develop such a product should continue to be worked through the RA Capacity Product Development working group and can build on the RA capacity product as described in the Commission's Resolution E-3995 regarding PG&E's Advice Letter filing.[7]

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[7] CPUC Resolution E-3995 of September 22, 2005 regarding PG&E Advice letter 2695-E.

The CAISO believes the development of trading mechanisms for a capacity product that can reduce barriers and allow LSEs to easily acquire capacity is fundamental to the Commission's RAR objectives and should be a Commission priority. Thus, the CAISO appreciates the steps the Commission is taking in this regard by addressing a tradable capacity product in Phase 1 of this proceeding.

1. Meets the Operational and Reliability Needs of the Grid

The CAISO continually strives to clearly communicate the operational and reliability needs of the grid and, therefore, believes it has a responsibility to specify to the Commission the nature and characteristics that must be embodied in any market or product solution that will help meet these needs. As such, the CAISO offers the following characteristics a standard, tradable capacity product must include. A tradable capacity product must:

- Be tied to physical resources that meet performance and deliverability requirements such that capacity is made available to the CAISO when and where needed.
- Identify, by means of CAISO resource ID, how it meets system and, or locational capacity requirements.
- Accommodates imports.
- Specify the physical resource that is available for dispatch by the CAISO for all hours the resource is physically capable of operating. Note this does not imply a resource must be able to produce energy for all hours.
- Restrict double counting of contracted capacity.
- Be subject to the CAISO Tariff, including, applicable must-offer obligations.
- Integrate with CAISO operations and have minimal administrative requirements.

2. Benefits of a Tradable Capacity Product

The CAISO believes that a readily tradable capacity product would create greater liquidity and ease RA fulfillment requirements and, therefore, compliance for the LSEs. Such a product would also give LSEs a tool to better address load fluctuation and load migration issues.

A tradable capacity product that also incorporates capacity tagging would be a powerful instrument that could easily link capacity to local areas, as well as complement the established bilateral market for LD contracts and ameliorate concerns regarding the counting of LD contracts. In addition, the work done here to refine this product by the Commission could translate into a fungible, standard product that is traded through a centralized capacity market (should such a market develop).

In summary, the CAISO encourages the Commission to approve well-defined attributes for a standard, readily tradable capacity product that meets the Commission's RAR objectives and supports the operational and reliability needs of the CAISO Controlled Grid.

C. Compliance Topics

As a general principle, the CAISO supports the Commission's adopted policy of a penalty equal to three times the cost for new capacity[8] as an appropriate initial inducement for LSE's to meet their RAR obligation. As stated by the Commission, a fundamental objective of RA is to, "promote the recovery of investment costs through

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[8] D.05-10-042, p. 93.

payments for capacity."[9] Therefore, the RA requirement must be tied to an economic consequence to succeed.

The CAISO also recognizes that for the Commission to enforce this policy, LSEs, both large and small, must have equal access to capacity. Should buyers be constrained in their ability to procure RA capacity, even an extremely high penalty may not have the intended effect of achieving compliance if LSEs cannot procure their minimum capacity requirements. This situation could occur if, for example, an LSE needs only a small increment of RA capacity to meet its requirement but the amount is commercially unattainable or physically infeasible and no market or regulatory mechanisms exist that can ameliorate this situation.

The CAISO could support a range of market or regulatory mechanisms that ensure overall capacity requirements are met given they satisfy the CAISO's need to maintain reliability by providing adequate physical resources when and where needed and impose minimal administrative burdens on the CAISO and its operations. For instance, potential short-term solutions could include a tradable capacity product or even a CPUC established "pooling" of IOU procured capacity with a transfer price mechanism to allocate the costs of the pooled capacity to all other CPUC-jurisdictional LSEs. A longer-term solution could be the development and implementation of a centralized capacity market. Ultimately, the CAISO, and hopefully the Commission, recognizes that any agreed-to solutions will likely evolve given time and implementation constraints and given the continuing discussion regarding the merits and efficacy of capacity versus energy markets.

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[9] D.05-10-042, p. 9.

Finally, the CAISO strongly encourages the Commission to conclusively resolve that compliance penalties will not accrue to General Fund of the State of California ("General Fund"). The need to pursue penalties through California's superior courts with recovery paid to the General Fund imposes a significant barrier to the efficient collection and effectiveness of penalties as a deterrent against non-compliance. Allowing penalty sums to flow to the General Fund fails to recognize the need to cover the costs of backstop procurement and would compel the entity responsible for this procurement to allocate costs, which may not be aligned with the Commission's procurement principles.[10] To the extent of its authority, the Commission must expeditiously resolve this matter.

D. Need for Evidentiary Hearings

The CAISO offers that evidentiary hearings are neither practical nor necessary. While maintaining schedules should not sacrifice substance and quality of a regulatory outcome, it is important for the Commission to resolve LCR obligations sufficiently before September 30, 2006 to permit efficient local procurement by LSEs. For this reason, the Commission properly set June 2006 as the target for an LCR decision. An evidentiary hearing would jeopardize that schedule. Testimony cannot be reasonably prepared until after the LCR study results are issued on or about April 21, 2006 (accordingly, the adopted scheduled may be of limited utility). If a comment schedule and procedure was adopted, rather than evidentiary hearing, the presiding ALJ could proceed with preparing a draft decision at that point. However, under the hearing

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[10] "Through RAR, the Commission is taking steps to (1) identify and assign [procurement] responsibilities in a manner that is effective in achieving reliability, cost efficient, and fair for all stakeholders; and (2) foster an environment that is more conducive to investment." (D.05-10-042, p. 7.)

schedule currently outlined, the ALJ would have to understand that due to CAISO resource constraints, the schedule to develop the LCR Study would be delayed by a minimum of two weeks.

More importantly, an evidentiary hearing is unnecessary and potentially unproductive. The LCR study is driven by the physical characteristics of the transmission system and feasible operating solutions mutually agreed-upon by the CAISO and the PTOs that continue to allow for compliance with Applicable Reliability Criteria (i.e., N-1 as well as N-1-1) and Good Utility Practice. The process of evaluating and developing feasible operating solutions rests on the expertise of the CAISO and the PTOs. Both entities have statutory responsibilities that may be impaired if other entities are allowed to dictate how the transmission system will be operated. The Commission should be entitled to render an informed decision on the efficacy of accepting alternative solutions to meeting Applicable Reliability Criteria based on technical input. Accordingly, under such circumstances and to the extent the information is subject to LSE scrutiny, written comments should be sufficient and no procedural or due process requirement mandates a more extensive procedure.

E. Local RAR Waivers

As a result of a reliance on bilateral contracting without a liquid, standardized capacity product whether or not centrally traded, a waiver mechanism of the LCR may be necessary. However, the practical barriers to an efficient process are substantial. For instance, on what basis are waivers granted or denied and when? What is the review and approval process? What cost allocation mechanism would ensure costs are fairly spread to those entities that don't meet their LCR? Due to these concerns, the CAISO cannot

readily support a waiver process; however, should the Commission approve a waiver, an ex-ante waiver is likely necessary to prevent potentially protracted litigation over the propriety of the imposition of any capacity surcharge.

III. Conclusion

The CAISO appreciates the opportunity to address these important Phase 1 topics as outlined by the Commission. The CAISO looks forward to continuing to work with the Commission to ensure the beneficial objectives of a local RAR program are successfully achieved through collaboration and cooperation.

March 13, 2006

Respectfully Submitted:

By: _____
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CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic and United States mail, Comments of The California Independent System Operator Corporation Regarding Phase 1 Topics Outlined in Commissioner Peevey's Ruling and Scoping Memo in Docket No. R.05-12-013.

Executed on March 13, 2006, at Folsom, California.

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