

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

Order Instituting Rulemaking to Promote)	
Policy and Program Coordination and)	R.04-04-003
Integration in Electric Utility Resource)	
Planning)	
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**RESPONSE OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
TO THE PETITION TO MODIFY DECISION 05-10-042 OF
SOUTHERN CALIFORNIA EDISON COMPANY**

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Dated: March 24, 2006

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In accordance with Rule 47 of the Commission’s Rules of Practice and Procedure, the California Independent System Operator Corporation (“CAISO”) respectfully responds to the Petition to Modify Decision (“D.”) 05-10-042 of Southern California Edison Company (“SCE”), filed February 22, 2006 (“Petition”) in the above-referenced proceeding. By its Petition, SCE seeks to modify D.05-10-042 in the following three areas:

1. Eliminate the adjustment for load migration in the month-ahead compliance filings;
2. Clarify that contracts signed prior to the issuance of the decision need not include contractual language obligating generators to comply with future resource performance obligations; and
3. Eliminate a real-time must offer obligation for import resources.

Each of these three areas is discussed below.

I. Load Migration

The CAISO agrees with the Commission in D.05-10-042 that the RA program should be designed to accommodate the business models of retail entities, including energy service providers (“ESPs”) to the extent practicable. That said, the procedures to adjust for load migration must be unambiguous and capable of timely review for compliance purposes. The CAISO believes that implementing procedures consistent with the direction of D.05-10-042 are possible and therefore believes that SCE’s petition to modify may be briefly deferred to allow

refinement of the month-ahead process to take place. In addition, while the CAISO recognizes that D.05-10-042 deferred local capacity issues to the current Phase 1 of R.05-12-013, the CAISO emphasizes that local capacity should be procured on a year-ahead basis and to the extent load migration affects a load serving entity's ("LSE") obligation, the Commission should develop a mechanism to reallocate the local capacity and costs associated with local capacity to the LSE receiving the load.

II. Pre-Existing Contracts Should Be Exempt from Supplier Performance Obligations through 2009

In D.05-10-042, the Commission approved, in principle, the future development and implementation of generator performance criteria to be enforced by the CAISO as part of the RA program. The Commission recognized that the absence of defined criteria at the present time introduces uncertainty regarding the allocation of risk in supply transactions. However, the Commission believed that any concern over this risk uncertainty could be mitigated through contract terms and conditions that "appropriately allocate any risks of generator nonperformance that accrue to the LSE" and expected "RA contracts to require generators to comply with all CAISO tariff provisions, including those to be developed addressing RA resource performance obligations and penalties."¹

SCE's Petition notes that D.05-10-042 is unclear whether RA contracts executed prior to the date of the decision are "required to have such features *in order to be counted* by an LSE toward its year-ahead showing and month-ahead requirements." (Petition at 7 [emphasis added].) Accordingly, the Petition advocates that D.05-10-042 be amended to state:

In particular, we would expect prospective contracting parties to formulate terms and conditions that appropriately allocate any risks of generator nonperformance that accrue to the LSE. Additionally, we expect future RA contracts to require generators to comply with all CAISO tariff provisions, including those to be developed addressing RA resource performance obligations and penalties. (Petition at 7-8.)

SCE’s narrative does not fully match the potential effect of its suggested changes to the decision. The issue is not whether contracts executed prior to the date of D.05-10-042 must have such contractual features “to be counted” by an LSE. Pre-existing contracts must be allowed to “count” and it should not be expected that such contracts must be renegotiated simply to qualify as eligible capacity. The real issue, rather, is whether such contracts are subject to future “de-rating” based on the performance of the underlying resource as set forth in Section 4.2 of D.05-10-042.

D.05-10-042 confirmed that “[b]ecause we are implementing a physical capacity-based RAR program, it is our policy that a resource should only count to the extent that the capacity of that resource can be relied upon to perform.”² As such, the Commission saw “no justification for promoting long-term contracting through an artifice that (1) ignores the actual capacity availability of a particular resource, and (2) does so at the expense of reduced reliability, cost shifting, or both.” The Commission, therefore, concluded that “if the CAISO determines that the effective capacity of a resource is to be de-rated based upon the resource’s actual performance, then only the adjusted amount should be counted as qualifying capacity in subsequent RA showings.” However, the Commission rejected the threat to long-term contracting posed by its de-rating policy explicitly based on LSEs’ ability “protect their interests by negotiating appropriate contract terms.”³

The CAISO strongly supports the Commission’s de-rating policy expressed in Section 4.2 of D.05-10-042. However, the CAISO is equally sympathetic to parties who entered into commercial transactions without contemplation of the regulatory changes associated with Resource Adequacy requirements let alone performance criteria. The CAISO believes several factors militate in favor of some level of exemption from performance criteria for existing

¹ D.05-10-042 at 18.

² *Id.* at 19.

³ *Id.* at 20.

contracts. First, implementation of performance criteria is unlikely to occur until, at least, RA compliance year 2008. Second, many electricity service providers are unlikely to have pre-D.05-10-042 contracts that extend much beyond 2008. Third, a significant portion of portfolios of the investor-owned utilities (“IOUs”) will not be subject to performance criteria in any event over the near-term. Specifically, system imports, grandfathered Firm LD (25% in 2008), and Department of Water Resource contracts are not amenable to likely performance criteria that evaluate the operation of physical generating units. IOU retained generation, however, will be subject to performance criteria.

Accordingly, the CAISO believes it would strike an appropriate balance between preserving the value of pre-D.05-10-042 contracts and encouraging suppliers to efficiently operate and maintain their assets by exempting pre-D.05-10-042 contracts from application of performance criteria through 2009. To the extent the IOUs have contracts with merchant generators that extend beyond 2009, the IOUs should be allowed to petition the Commission to continue the exemption for good cause based on the actual performance of the resource.

III. Post-D.05-10-042 Import Contracts Should Be Subject to Must-Offer Obligations

SCE asserts that D.05-10-042 “should be modified to state that the real-time must offer obligation should not be applied to import resources.”⁴ (Petition at 8.) SCE lists three justifications for the proposed change:

1. “Such imports do not have transmission priority under the Federal Regulatory Commission’s open access rules and, therefore, could not as a practical matter be preferentially called upon during congestion conditions to meet the CAISO’s

⁴ It should be noted that the obligation for imports to be available to the CAISO into real-time does not effect contracts executed prior to the date of D.05-10-042. In D.04-10-035, the Commission adopted the availability obligation as its “policy going forward” such that “[c]ontracts executed after completion of Phase 2 proceedings on this topic should include such provisions in order to be eligible to count as qualified capacity in satisfaction of forward commitment obligations.” (D.04-10-035 at p. 43.) Thus, LSEs should not be concerned if certain pre-existing contracts have “call-options” that are incompatible with the real-time offer obligation.

needs, even if they were subject to must-offer requirements.” (*Id.*)

2. “Since the CAISO must resolve congestion associated with import schedules based on bids, the CAISO cannot accept RA imports and reject non-RA imports at times when an intertie is congested.” (*Id.*)
3. “Other control areas do not regularly provide for schedule changes in real-time, and instead require hour-ahead schedule changes for imports and exports.”

The CAISO does not believe that the foregoing reasons warrant modification to D.05-10-042.

The first two purported justifications are related and appear to be confused and without merit. From the CAISO’s perspective, “transmission priority” and “preferential” dispatch are unnecessary and wholly unconnected to a real-time availability requirement. The CAISO understands the Commission’s availability requirement to be that if an RA resource is not scheduled in the day-ahead or hour-ahead markets, then the resource must make itself available in real-time if “physically capable.” Resources make themselves available to the CAISO in real-time through “Supplemental Energy” bids. Contrary to the implication raised by the SCE, the CAISO has long accommodated Supplemental Energy bids from imports or, in the CAISO’s nomenclature, System Resources. Accordingly, the Commission’s availability obligation simply imposes a requirement that RA resources utilize existing CAISO market mechanisms.

The value of a real-time bid obligation is not vitiated by the fact that, in the CAISO’s day-ahead and hour-ahead markets, Inter-Zonal Congestion is resolved economically based on Adjustment Bids that reflect the relative value Scheduling Coordinators place on the intertie capacity. SCE is, therefore, correct that the RA status is irrelevant to resolution of forward Inter-Zonal Congestion and that Schedules for RA System Resources will not be given preference over other Schedules for System Resources in the day-ahead and hour-ahead markets. However, having additional intertie energy available in real-time beyond that successfully scheduled in the day-ahead and hour-ahead markets does assist the CAISO in maintaining grid reliability. The

CAISO relies on Supplemental Energy bids, including from System Resources, to meet real-time imbalances between actual and scheduled demand and generation and to relieve congestion, if necessary, to ensure system reliability, and to maintain other Applicable Reliability Criteria. (See CAISO Tariff § 34.3.0.1.2.) Generally, the CAISO can call on System Resources to increase generation⁵ in real-time to meet system reliability needs only when *transmission capacity has become available* on the CAISO's system, i.e., its side of the intertie. In such circumstances, generally capacity has also become available in real-time over the intertie from the exporting Control Area.

SCE's third justification seems to imply that it is impractical for Scheduling Coordinators to obtain transmission capacity to support Supplemental Energy bids. The merit of this claim is inherently refuted by the very fact that the CAISO accepts Supplemental Energy bids from System Resources. Under the CAISO Tariff, Supplemental Energy bids may be submitted up to sixty-two (62) minutes prior to the beginning of the settlement period. As part of this submission, Scheduling Coordinators may select through a "flag" whether the System Resource is available for intra-hour redispatch or whether the bid must be "pre-dispatched" and not redispatched during the actual operating hour. (CAISO Tariff § 34.2.1.4.) The CAISO pre-dispatches System Resources "prior to the beginning of each hour consistent with applicable WECC interchange scheduling practices." (CAISO Tariff § 34.3.0.2.) In this regard, the CAISO pre-dispatches System Resources forty (40) minutes prior to the operating hour, which is prior to the WECC-wide convention for closing transmission scheduling transactions. Pre-dispatched System Resources satisfy a real-time bidding obligation. And, while it is possible for a real-time transmission derate to prevent delivery of a pre-dispatched System Resource, this is normally not be a concern because of final control area check-out procedures. As such, there is no

⁵ If a System Resource was not scheduled in the day-ahead or hour-ahead markets, there is no Energy from that System Resource to decrease in real-time. If partially scheduled, then there is the opportunity for that System Resource to both increase and decrease its available capacity.


insurmountable “seams” issue that would prevent an RA import resource from submitting useful Supplemental Energy bids.

IV. Conclusion

For the foregoing reasons, the CAISO respectfully requests that the Commission grant in part and deny in part SCE’s petition to modify in a manner consistent with the recommendations expressed herein.

March 24, 2006

Respectfully Submitted:

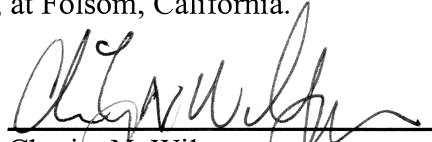
By: 

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CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic and United States mail, the Response of the California Independent System Operator Corporation to Petition to Modify Decision 05-10-042 of Southern California Edison Company in Docket No. R.04-04-003.

Executed on March 24, 2006, at Folsom, California.


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