

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

Order Instituting Rulemaking to Oversee the
Resource Adequacy Program, Consider
Program Refinements, and Establish Annual
Local and Flexible Procurement Obligations
for the 2019 and 2020 Compliance Years

Rulemaking 17-09-020
(Filed September 28, 2017)

**COMMENTS OF THE CALIFORNIA INDEPENDENT
SYSTEM OPERATOR CORPORATION**

I. Introduction

The California Independent System Operator Corporation (CAISO) hereby provides comments in support of the California Community Choice Association's (CalCCA) *Motion for Stay of Decision 19-10-021* (Motion for Stay) pursuant to the CalCCA's *Motion to Shorten Time to Respond to Motion for Stay of Decision 19-10-021*, both of which were filed in this proceeding on October 24, 2019.

II. Discussion

The CAISO supports the Motion to Stay Decision (D.) 19-10-021. As CalCCA noted in the Motion for Stay, load-serving entities face both a year-ahead and month-ahead compliance deadline for resource adequacy showings on October 31, 2019 and November 17, 2019, respectively. D.19-02-021 would require load-serving entities to make significant changes to resource adequacy import contracts to ensure that they continue to meet the requirements imposed in the decision.

The unique circumstances in this case warrant granting the stay. Specifically, the changes between the proposed decision issued September 6, 2019 and the decision approved by the Commission at the October 10, 2019 Voting Meeting create significant uncertainty for all market participants. The CAISO notes that parties did not have an opportunity to comment on these changes and the Commission has not fully considered the potential capacity and energy market impacts. The proposed decision required resource adequacy imports to "flow" energy only during the CAISO's availability assessment hours (*i.e.*, 4:00 p.m. to 9:00 p.m.), whereas D.19-02-021 requires self-scheduling "consistent with the timeframe established in the governing contract." It is unclear exactly whether and how load-serving entities will need to

modify resource adequacy import contracts to comply with these changes. As CalCCA states in its Application for Rehearing¹, filed concurrently with the Motion for Stay, the meaning of “timeframe established in the governing contract” is particularly vague, as it is unclear as to what “timeframe” is referenced and what it is “established” to do.

Given the uncertain compliance requirements, the CAISO recommends that the Commission grant CalCCA’s Motion to Stay, thereby maintaining the status quo for the upcoming year-ahead and month-ahead resource adequacy showings. This would allow the Commission time to review or, at a minimum, clarify D.19-02-021 without causing undue hardship to load-serving entities and potential unnecessary cost increases for ratepayers.

III. Conclusion

The CAISO appreciates the opportunity to provide these comments and recommends that the Commission grant the Motion to the Stay.

Respectfully submitted,

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¹ California Community Choice Association, *Application for Rehearing of Decision 19-10-021 of the California Community Choice Association*, October 24, 2019