

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

Order Instituting Rulemaking Regarding Policies and Protocols for Demand Response, Load Impact Estimates, Cost-Effectiveness Methodologies, Megawatt Goals and Alignment with California Independent System Operator Protocols

Rulemaking 07-01-041
(January 25, 2007)

**RESPONSE OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
TO CLECA MOTION TO STRIKE PORTIONS OF THE REVISED IOU'S
STRAW PROPOSAL FOR DEMAND RESPONSE COST EFFECTIVENESS**

I. Introduction

The California Independent System Operator Corporation (“CAISO”) submits this response to the motion of the California Large Energy Consumers Association (“CLECA”) to strike portions of the Revised IOU Straw Proposal for Demand Response Cost Effectiveness. CLECA has made this motion in the alternative to CLECA’s request for evidentiary hearings regarding three issues for which CLECA believes there are factual disputes. The CAISO’s response is prompted by the second factual issue raised by CLECA:

2. The proposed requirement that only DR programs qualifying for resource adequacy (RA) status be treated as avoiding capacity costs.

In support of its request for hearings and/or motion to strike for this issue, CLECA purports to characterize certain positions of the CAISO regarding the valuation of Demand Response resources. The CAISO feels that CLECA has mischaracterized, somewhat, the CAISO’s position on the subject, and so the CAISO files these comments to clarify the record as to the CAISO’s position.

We note that the Commission’s recent Order Instituting Rulemaking 07-09-008 (issued September 25, 2007) articulated the foundational steps in determining when evidentiary hearings are necessary:

Parties who believe that evidentiary hearings are necessary shall follow the procedure set forth below. If any party contends that evidentiary hearings are necessary, it shall, no later than October 19, 2007, in its opening comments:

- (1) Identify each material contested issue of fact on which hearings should be held (explaining as necessary why the issue is material);
- (2) For each such issue listed in (1) above, identify the evidence to be offered and specify whether the evidence constitutes “legislative facts” or “adjudicative facts”; and,
- (3) State why an evidentiary hearing is legally required.¹

II. CLECA Characterization of CAISO Positions and CAISO Response

CLECA Statement:

The Utilities’ DR CE Report asserts that only DR which qualifies as RA capacity should be considered as capable of avoiding generation capacity costs. We note that the CAISO has attempted to argue that resources that cannot be available to the CAISO *for residual unit commitment (“RUC”) by 10 am on a day-ahead basis* should not be given RA qualifying status [citing the CAISO’s Proposals on Track 1 Issues, dated January 26, 2007, at pp. 26-29]. This position would exclude from RA qualification all day-of DR programs and all reliability programs. (CLECA Request and Motion at pp. 6-7, emphasis added).

CAISO Response:

CAISO notes initially that the terms “reliability programs” and “emergency programs” are interchangeable, referring to DR curtailment that is available only after the CAISO declares a Stage 2 emergency.² CLECA mischaracterizes the CAISO’s objection to qualifying emergency DR programs as RA capacity as a mere “day-ahead”

¹ OIR 07-09-008 (Order Instituting Rulemaking to Consider Establishing California Institute for Climate Solutions) at p. 11.

² The CAISO calls a Stage 2 emergency when operating reserves fall below 5% or are anticipated to fall below 5%. The Stage 2 emergency criteria of 5% operating reserve level is based upon WECC and NERC reliability standards.

timing and/or a RUC issue. Timing is not the issue. Rather, the issue is the *availability* of the emergency programs.

Availability is a central tenet of the CPUC's RA program. In this regard, the Commission has clearly stated that resource adequacy is about "laying a foundation for the required infrastructure investment and *assuring that capacity is available when and where needed.*"³ In contrast, emergency DR programs are only available upon the declaration of an emergency. Accordingly, CLECA misses the CAISO's central point stated in the CAISO pleading from which CLECA quotes in its request and motion:

Specifically, the CAISO feels strongly that reliability-based DR programs that are *only available for dispatch in limited circumstances*, i.e., only when the CAISO is *in an emergency (Stage 2)* are not sufficiently "available" to be considered a viable resource adequacy product.⁴

The CAISO believes that an RA design that *requires declaring emergencies* to gain access to RA capacity that is relied upon to meet *normal* operating conditions is illogical and violates the CPUC's fundamental RA "availability" objective.

Moreover, contrary to CLECA's assertion in its request and motion, the CAISO's position that DR programs must be "available" to be a viable RA product does not "exclude from RA qualification *all day-of DR programs.*" *Non-emergency*, day ahead, day-of, or real time DR resources would still be able to participate in the CAISO's markets or be incorporated into the CAISO's operations. Non-emergency programs are sufficiently available because they are triggered by events which are either known in advance or can be relied upon under normal operating conditions.

Furthermore, the fact that emergency DR programs are unavailable when the CAISO is operating under normal conditions raises two concerns that have potential cost consequences. First, the CAISO would have to first dispatch any available *non-RA resources* (to maintain reliability standards and to prevent declaring an emergency)

³ R.05-12-013, ALJ Ruling on Track 2 Proposals, February 29, 2007, p. 4 (emphasis added).

⁴ Proposals of the California Independent System Operator on Track 1 Issues, January 26, 2007, p.26, (emphasis added).

before the CAISO could use the emergency DR programs. This potentially imposes additional costs on the system and may offset the purported economic justification for counting emergency DR programs as RA capacity in the first place. Second, the fact that emergency DR programs cannot be considered in RUC highlights a specific example of the fundamental availability problem of emergency DR programs as RA. The inability to participate in RUC is not, in and of itself, the justification for why the CAISO would disallow DR programs to count as RA capacity. Rather, it is the fact that a system emergency must be declared to call them that runs counter to the fundamental tenets of an effective Resource Adequacy Program, which is to have sufficient capacity available to the grid at the times and locations that it is needed, even during stressed conditions.⁵

CLECA Statement:

Recently, the CAISO has discussed [a] means of including day-of DR programs in their unit commitment process, although this process is not yet complete. Yet, the CAISO has consistently taken the position that reliability DR resources should not be provided with RA value because they are not available in the unit commitment process, despite the fact that they are available to be used on the day in question and have been used many times to avoid outages for firm service customers that might otherwise occur on the same day [fn omitted]. These reliability DR programs exist to allow for resources needed beyond that day-ahead procurement, because “things happen” (the unexpected loss of a generating plant or a transmission line, for example) on short notice that would otherwise unduly reduce the operating reserves available to the CAISO. In fact, the CAISO acknowledges that these programs are valuable for reliability purposes [fn omitted].

CAISO Response:

The Commission’s adopted system planning reserve margin sets a level of capacity covering a 1-in-2-year peak Demand forecast, operating reserves, generator forced outages, and inherent forecast error, i.e., incorrect assumptions on economic growth. Moreover, the planning reserve margin also contains a subset of local capacity

⁵ D.05-10-042, p. 7-8.

determinations, which are performed on a 1-in-10-year peak Demand forecast, in order to provide protection from critical contingencies in certain localities.

This planning reserve margin is intended to ensure that sufficient RA capacity exists to reliably operate the grid under “non-emergency,” yet stressed conditions (i.e. sufficient generation should be available under peak demand conditions even when there is a certain level of unexpected outages)⁶. Should RA include emergency DR programs, the planning reserve margin would no longer provide sufficient capacity to cover the fundamental components for which it must account. Again, the CAISO does not believe that the Commission intends for the CAISO to declare an emergency, when, for example, circumstances arise such as a deviation in load forecast or a generation forced outage. This approach stands the RA concept on its head, because it trends toward a planning scheme that plans on having emergencies in order to call resources, rather than planning to have resources that *avoid* the need to declare emergencies.

The CAISO agrees that emergency DR programs do have value in protecting against unexpected transmission outages or other severe anomalies that can threaten the ability of the CAISO to serve firm load or meet its operating reserves requirements (such as the one-in-57-year heat storm which occurred in 2006). In these infrequent circumstances, where the underlying assumptions of the RA program are violated, use of emergency DR programs is entirely appropriate. However, the planning reserve margin should never be determined in such a way as to include, as a basic assumption, the

⁶ See D.05-10-042 at pp. 7-8.

expectation that system emergency declarations will be declared with some level of frequency, so that emergency DR programs may be dispatched to meet normal operating conditions.

Dated: October 4, 2007

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on October 4, 2007. I served on the parties listed on the Service List for Proceeding 07-01-041, by electronic mail, a copy of the foregoing Response of the California Independent System Operator to CLECA Motion To Strike Portions of the Revised IOU's Straw Proposal For Demand Response Cost Effectiveness

Executed on October 4, 2007 at Folsom,
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/s/ *Melissa Hicks*

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