

**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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**COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION
ON ADMINISTRATIVE LAW JUDGE'S RULING REGARDING PHASE 2**

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Dated: September 15, 2006

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The California Independent System Operator Corporation (“CAISO”) respectfully submits its comments in response to the Ruling Regarding Phase 2, issued by Administrative Law Judge (“ALJ”) Wetzell on August 18, 2006, in the above-referenced docket (“Phase 2 Ruling”).

I. INTRODUCTION

Pursuant to the direction provided in the Phase 2 Ruling, the CAISO’s comments are intended to (1) identify issues or topics that should be addressed in Phase 2, (2) establish priorities and resulting procedural schedules for those issues or topics, (3) and recommend the procedural approaches, i.e., hearings, workshops, etc., to be used in determining the outcome of each issue or topic. In this regard, the CAISO appreciates the effort of Commission staff in compiling the potential subjects for determination and preparing a matrix to assist the parties in ranking the issues and topics in terms of priority and procedural schedule. The CAISO’s matrix is attached.

In filling out the matrix and developing these comments, the CAISO agrees with the general tiered decisional structure outlined by Commission staff. As such, the

CAISO's comments place individual issues within the Commission staff's proposed decisional timeline and address the basis for the assigned priority of particular topics. In many cases, the CAISO has moved topics from the proposed decisional timeframe to another timeframe to reflect the CAISO's perception of the relative priority of the topic or the practical ability to address the issues under the original Commission staff proposed schedule. Specifically, the CAISO cautions against unrealistic expectations with respect to the development, assessment, and implementation of any modifications to the RA program, *e.g.* a probabilistic methodology for determining local and system resource adequacy (also "RA") requirements. As discussed more fully below, while the CAISO concurs that the pursuit of a probabilistic methodology offers potential advantages through a more explicit measurement of the reliability goal underlying resource adequacy, the ability to select between potentially competing specific methodologies is highly improbable by December 2007.

Finally, the CAISO opposes, as a general matter, the use of evidentiary hearings to advance the Commission's resource adequacy program. The experience in this docket and its predecessor is that parties are capable of comprehensively addressing complex topics and developing a record sufficient for the Commission to make well-informed decisions. That said, the CAISO agrees that on the topic of "capacity markets" greater structure than the prior workshop/comment method may be appropriate. However, rather than evidentiary hearings, the Commission should specifically require proponents of various capacity market options to produce detail written reports describing their proposals. Parties should be required to offer solutions in addition to criticism and specifically address deficiencies that are identified in their proposals, thus allowing the

Commission and all parties to make side-by-side comparisons where alternate solutions are proposed.

II. JANUARY 2007 DECISION – URGENT 2007 REVISIONS/UPDATES

The Attachment proposes to reserve a January 2007 Commission decision only for topics perceived to be critical to the successful implementation of the RA program in 2007. Accordingly, any topic assigned to this decisional timeframe inherently falls within the highest priority classification.

Commission staff lists two potential topics for a possible January 2007 decision: (1) adjustment of the California Energy Commission's ("CEC") load forecast for 2007 and (2) confidentiality. At the pre-hearing conference, it was noted that the need to include adjustment of the CEC's load forecast largely constitutes a placeholder to preserve, as a procedural matter, the ability to alter load serving entities' procurement obligations given previous Commission decisions should the CEC elect to adjust its 2007 load forecast based on data from July's "heat storm." This recognizes that the primary measure of success of the RA program is when resources are available when and where needed to ensure reliable electric service. Accordingly, the CAISO agrees with this placeholder, but believes that the Commission should expand the scope of the placeholder to determine if other limited recalibrations of the program are equally appropriate to ensure success for 2007.

In particular, given the need for an expeditious decision, the Commission should pointedly focus on whether adjustments to the level or quantity of the resource obligation should be adopted. In other words, the Commission should ask whether the RA program is providing the insurance it expected. If yes, no changes are necessary. However, if the

answer is no, adjustments are warranted and should be made prior to summer 2007.¹ Such adjustments can arise not only from a correction in the base forecast, but also by adjusting the forecast target from the 1-in-2 to 1-in-10, consistent with the local obligation, expanding the planning reserve margin, or altering qualifying capacity counting protocols. Each potential adjustment has its likely pros and cons and, should changes to the program be deemed necessary, the Commission should have the flexibility to select between one or more of these elements to achieve its objective.

Based on the foregoing, the CAISO believes the following topics should fall within the scope of a January 2007 decision:²

- I.a- Update RA Requirements for CEC Load Forecast Changes
- I.b- Confidentiality
- II.d- Reconsideration of Planning Reserve Margin
- II.f³- Demand Response Program Impacts

In order to meet this admittedly aggressive time frame, the CAISO, Commission staff, and CEC staff should consider by the end of October 2006 whether the RA program provided adequate resources to meet 2006 load levels and should also consider other factors such as, what would be the effect of an average hydro year. This review can form the basis of one or more workshops in early November that would culminate in party comments by the end of November 2006 or early December 2006. Depending on the

¹ The CAISO recognizes that all adjustments or increases in the level of reliability insurance provided by the RA program should be evaluated on a cost-benefit basis.

² The confidentiality issue identified as I.b could proceed on a more expedited and independent track.

³ Item II.f addresses demand response counting issues. The only issue in this area that the CAISO believes falls within the January 2007 timeframe is whether interruptible demand response resources that currently may be dispatched only under System Emergency conditions should continue to count toward meeting the planning reserve margin based on their overall impact on program performance. Other counting and allocation rules for 2008 and beyond are more appropriate for the June 2007 decision.

Commission's meeting schedule for 2007, it may be more realistic to move the Commission consideration of a proposed decision to February 2007. Moreover, in order to allow for orderly procurement, any proposed changes would have to be incremental and may be deferred to the June compliance month, i.e., reflected in April compliance filings.

III. JUNE 2007 DECISION – REVISIONS FOR 2008 PROGRAM

High Priority Items

1. Local Capacity Requirements – Item 1.a

The Attachment identifies several issues related to implementation of Local RAR beyond 2007 that could be encompassed by a June 2007 decision:

- (i) adoption of LCR for 2008 because D.06-0-04 only adopted LCR for 2007 compliance year;
- (ii) review LCR study methodology for 2008 and beyond, including explore alterations to study assumptions (Aglet) and/or application of monthly or seasonal obligations (PG&E)
- (iii) alteration of program implementation rules to address load migration and the effect of load pocket aggregation rules.

Given the limited scope of the approval of Local RAR in D.06-06-064, it is imperative that a June 2007 decision extend the Local RAR obligation on load serving entities for 2008 and beyond. In this regard, the participants at the pre-hearing conference expressed a clear preference to gain experience with the current Local RAR prior to embarking, if at all, on the process of altering the fundamental underlying methodology. The CAISO agrees with this pragmatic sentiment for several reasons.

First, the CAISO believes that parties have become more educated regarding the underlying assumptions and basis for the Local RAR and therefore recognize that it represents a continuation, rather novel departure, from current system planning and

operation practices. Accordingly, the pre-hearing conference participants seemed to acknowledge that evaluating alternatives for 2008 would be equivalent to attempting to solve a problem that does not exist. Second, and more importantly, the CAISO is in the process of convening a group of industry experts, representing diverse market interests, the Commission and CEC, to evaluate and recommend refinements to its existing Local RAR methodology. Consistent with the discussion in the Attachment, this review may include assessment of base cases, interpretation of reliability standards, use of operating solutions, and potentially developing seasonal obligations. It is important to note that conducting this review in a CAISO process, rather than primarily in a Commission proceeding, reflects the reality that the CAISO's proposed MRTU tariff anticipates applying local requirements on non-Commission jurisdictional load serving entities within its Control Area. Achieving consistency between the obligations applicable to multi-jurisdictional groups will help avoid unintended consequences and mismatches. Finally, utilizing the existing Local RAR foundation presents the only realistic outcome given the regulatory deadlines. As noted in the Attachment, "the timing of this proceeding may preclude movement to probabilistic methodologies." This is correct; moving to a probabilistic approach is unrealistic for 2008 as discussed further below.

The CAISO believes that this proceeding can be accomplished similarly to the prior adoption of Local RAR. The CAISO will publish its 2008 LCR Study under a schedule established by the Commission that allows for subsequent comment, preparation of a proposed decision, and final Commission determination by June 2007. Other potential changes to Local RAR implementation, such as alteration in aggregation rules,

should proceed on a parallel track at the Commission for inclusion in the June 2007 decision.

2. Zonal Requirements – Item II.b

As noted above, a fundamental objective of resource adequacy is to enhance electric service reliability by ensuring that resources are available when and where needed. In fact, the Commission's adoption of local capacity requirements acknowledges that transmission constraints, which limit the ability to import energy into the region, creates a need for generation to be available in such load pockets to reliably meet customer demand. The CAISO's proposed zonal requirement arises from the very same concept. Zones are merely larger load pockets created by transmission constraints between the zones and adjacent control areas. Thus, like the local capacity requirements, the proposed zonal requirement is designed to ensure that sufficient generating capacity exists with each zone to allow the system to serve load within the zonal portion of the CAISO control area and recover from the single worst contingency without reliance on firm load shedding. In addition, the FERC must offer obligation is expected to retire at the end of 2007 and will leave a CAISO backstop/procurement gap for maintaining reliability requirements within the zones.

The general concept of a zonal requirement can be simply demonstrated by reference to the south of Path 26 area ("SP26"). Although the CAISO recommends using uniform 1-in-10 load forecast for all RA requirements, for purposes of this example the CEC's 2007 load forecast for SP26 of 27,574 MW will be used (California Energy Commission Staff Forecast of 2007 Peak Demand [June 2006].)

Approximately 10,100 MW can be imported into SP26. This includes the known intertie imports into SP26 plus system energy “transfers” from within the CAISO Control Area between NP26 and SP26. However, the CAISO must account for the single worst contingency in SP26 and this equates to the loss of the Midway-Vincent line (Path 26) or the Pacific DC intertie. The loss of either the DC intertie or Path 26 will decrease the transfer capability into SP26 by 2,000 MW; thus, from a planning perspective, only 8,100 MW of import capability into SP26 can be relied upon.

Therefore, if the load in SP26 is 27,574 MW and the reliable import/transfer capability into SP26 is 8,100 MW, then 19,474 MW of generation resources must be available within SP26. However, since the local areas are subsumed within the zones, the quantity of local capacity procured to meet the Local RAR must be subtracted. In SP26, the LCR is 11,624 MW (8,843 MW in the LA Basin and 2,781 MW in San Diego), therefore, 19,474 MW – 11,624 MW is 7,850 MW of incremental capacity must be procured to effectively meet the reliability requirements in SP26. Stated differently, to reliably serve demand in SP26, load serving entities should not rely upon total imports into the zone that exceed the zone’s available transfer capability, which in the foregoing example is 8,100 MW.

The need for zonal capacity is a significant issue that could have tangible economic impacts in the MRTU time period absent a zonal resource adequacy requirement. Currently, the need for zonal capacity is manifested through the CAISO’s denial of must-offer waivers labeled “SP 26 Capacity.” Prior to MRTU, should the CAISO require capacity in SP26 not provided through RA procurement or otherwise procured “ineffectively” to meet the reliability need, e.g. located in NP26 rather than in

SP26, the CAISO will deny must offer waivers and pay in accordance with the outcome of the Reliability Capacity Services Tariff (“RCST”) proceeding pending before FERC. Thus, if not resolved, reliability requirements will be left to the CAISO to procure through FERC approved mechanisms rather than through the intentional and calculated actions of the LSEs.

Thus, the CAISO believes a zonal capacity requirement is imperative for June 2007 and should be incorporated into Phase 2. By its very nature, a zonal capacity requirement is analogous to a local capacity requirement, and therefore, would easily integrate into the Commission’s overall RA program. Similar to Phase 1, the CAISO is confident that a proper and timely record can be established by means of CAISO reports, CPUC workshops and party comments in much the same the LCR record was established in Phase I.

3. Revisions to Load Forecasting Timing/Protocols – Item II.g

The fact that the CEC felt compelled to review its 2007 load forecast based on summer 2006 data confirms the discussion in the Attachment about this item that “[e]arly experience with RA compliance suggests that the time period for the load forecast review and adjustment is too far in advance of the compliance filings.” The January 2007 decision will intrinsically address this problem for compliance year 2007 by looking at summer 2006 data. However, the CAISO believes that a high priority should be given to modifying the RA program, whether by changing the compliance calendar or otherwise, to ensure that more accurate and timely load forecasting data is reflected in load serving entities obligations on a going forward, rather than ad hoc, basis. Accordingly, the CAISO assigns this matter high priority for June 2007. The CAISO believes that this

issue should be accomplished by assigning an IOU to the task of drafting a straw proposal upon which subsequent workshops regarding the load forecast and compliance year will be held.

4. Continued Development of Standard Capacity Product – Item II.m

Regardless of the ultimate outcome of the capacity market discussion in Phase 2, RA requirements continue to be met through bilaterally negotiated transactions for the near future. The existence of an accepted, readily tradable standard capacity product remains important to enhancing the efficiency of the current RA program model. Moreover, to the extent expectations are uncertain for certain resource types, such as imports as asserted by PG&E, it is likely that parties will be unable to properly allocate risk, which can lead to inefficient pricing of capacity and increase transaction costs. For these reasons, the CAISO believes that additional effort in resolving existing uncertainties regarding expected obligations should be elevated to a high priority for 2008. The CAISO believes that this issue should be accomplished by requesting that concerned LSEs draft a straw proposal that identifies the points of concern and their solution, upon which subsequent workshops can be held for discussion and resolution.

Other Potential June 2007 Decision Items

The CAISO has identified other topics that should be considered for June 2007 resolution, but have lower priority than the foregoing topics. In particular, the CAISO agrees that the Commission's RA program and the CAISO's MRTU must be closely coordinated. In light of this need, and the projected MRTU implementation date of November 2007, the June 2007 decision time frame appears appropriate to solve any lingering coordination issues. At this time, the CAISO is uncertain whether Items II.c

(coordination of '08 RA program with RMR) and II.j (coordination of RA with MRTU), both of which address the intersection of CAISO programs and RA, accurately and fully capture the issues that must be addressed at the Commission. It is clear, however, that a full review of the products and services obtained currently through RMR contracts and their coordination with the development of RA products must occur, and that necessary modifications to existing programs take place in the respective Commission and CAISO forums. Consequently, the CAISO believes it is prudent to include coordination issues within the scope of the June 2007 decision time frame, but utilize written comments to solicit more refined areas of potential concern that can form the basis of a subsequent scoping memo.

The Attachment includes RA program changes triggered by “significant events” as a March 2008 item (IV.f). The CAISO believes this item desires more prompt consideration in the June 2007 time frame. As the CAISO has previously advocated, the Commission should develop a reasonable obligation on load serving entities to replace a significant loss of relied upon capacity. The CAISO’s thinking on this issue was set forth in its April 21, 2006 Comments on the Local Resource Adequacy Requirements Phase 1 Staff Report (pages 18-21), and believes this can be used as an initial proposal for consideration in the June 2007 decision.

IV. DECEMBER 2007 – PROGRAM EXPANSION

High Priority Items

1. Capacity Markets, Registration/Tagging, and Multi-year Commitments – Items III.a, II.k, and III.b

In its comments on the Commission’s Capacity Markets White Paper, dated September 23, 2005, the CAISO acknowledged that the current RA program was likely an interim mechanism until a more enduring solution could be devised. The CAISO also cautioned the Commission to review a range of potential capacity market paradigms. The CAISO continues to support a thorough assessment of different capacity market options, but also agrees that no purpose is served in delaying this assessment.

Accordingly, the CAISO prefers to accelerate a decision on the optimal capacity market model by or before December 2007 provided a sufficient record is established. The CAISO supports establishing this procedural goal and conducting a separate proceeding in parallel with those efforts to resolve the June 2007 decisional issues. Indeed, it would be impractical to establish a December 2007 target date for a decision on capacity markets if these long-term topics are to commence sequentially after adopting the 2008 RA program refinements.

The CAISO also continues to strongly support the creation by the Commission of a longer-term, multi-year RA commitment imposed on load-serving entities to support new resource investment. Any proposed capacity market design must accommodate and encourage such multi-year forward commitments. However, the CAISO also views this topic as so important that it should be addressed independently as well as in conjunction with a formal capacity market. In other words, even if no agreement was reached on the

character of a capacity market, the Commission should be prepared in December 2007 to impose some form of multi-year forward obligation as part of the current RA program.

The CAISO has also moved the issue of resource “registration and tagging” from June 2007 to December 2007. The CAISO does not believe it makes sense to consider this solution outside the context of the comprehensive, long-term solution. In fact, it may form the long-term solution. Therefore, in the interest of efficiently utilizing the resources of the parties to this proceeding, the CAISO recommends incorporating this topic into the overall capacity market discussion.

Unlike certain parties at the pre-hearing conference, the CAISO does not support the use of evidentiary hearings for this topic. This would be an inefficient and extremely expensive approach to resolving highly complex issues. Rather, the CAISO supports the workshop and comment model.

Other Potential December 2007 Topics – Items III.c, III.d, III.e, II.f, and II.i

The Attachment lists “resource diversity,” i.e., quick start requirements, as a December 2007 issue. The CAISO offered this issue as a concern back in the Phase 1 proceeding. It is appropriate to consider incentives to promote resource diversification as an element of the long-term market decision. However, the CAISO believes that experience with the RA program is necessary prior to imposing administrative solutions. Accordingly, the CAISO has accorded this item secondary importance for the December 2007 decision. The other items listed in the Attachment as December 2007 issues, including LSE opt-out mechanisms (III.c) and market power mitigation (III.d) are also proper for December 2007 to the extent consideration of such issues do not dilute the

Commission ability to timely and comprehensively address the issues described above as high priority.

The CAISO has also reassigned the demand response topic of DR Program Impacts (II.f) from the June 2007 time frame to the December 2007 time frame (II.f). The CAISO has placed this issue lower in the timeline simply because of the absence of familiarity with current allocation rules and the recognition that the complexity of changing the rules, in the short-term, is likely to outweigh the benefit to the RA program of any rule modification.

The CAISO, however, is concerned with the DR Program Dispatch issue (II.i). The primary concern is the ability to count certain demand response resources when such resources are only dispatchable during a System Emergency. The CAISO believes that changes in existing triggers, etc. should occur in the December 2007 time period, but the current existing consequences of the triggers should be addressed within the January 2007 timeframe (See footnote 3).

V. MARCH 2008 – FURTHER CLEANUP

1. Qualifying Capacity – Item II.e

The CAISO has identified its priorities for the March 2008 decision in the attached matrix. The CAISO simply notes here that it has reassigned topics to the March 2008 decision time frame. In particular, the CAISO has placed item II.e, relating to qualifying capacity, into this decisional timeframe. The CAISO has done this again based on the premise that the current RA program should be assessed prior to embarking on complex and significant overhauls, including modifications of counting conventions. Additionally, the CAISO believes the March 2008 time frame is more appropriate for

addressing coordination with the adoption by the CAISO of generator performance measures. The CAISO intends to work closely with stakeholders and the Commission in developing such standards. But it would seem more appropriate to evaluate potential changes to the RA program resulting from the performance measures until after the performance measures are defined. The CAISO must proceed through its process first. As such, the March 2008 time period would appear to be the earliest possible time to engage in the coordination effort at the Commission.

2. Probabilistic Assessment – Item III.f

The CAISO has also reassigned item III.f of the Attachment, which asks whether a “probabilistic” methodology for determining LCRs should be pursued and, if so, what procedural means should be used for this admittedly “highly technical subject.” Item III.f is slotted by Commission staff in the December 2007 decision category. As discussed below, this reassignment is a reflection of the practical realities surrounding movement toward a probabilistic Local RAR analysis, rather than a reflection of its relative importance. Indeed, a probabilistic or loss of load probability (“LOLP”) based LCR criteria may lead to more economically efficient decisions regarding the capacity that is needed at any particular location. Another important objective of such an approach would be to demonstrate that capacity requirements are aligned with the state regulators desired level of service reliability.

There are two separate practical considerations that drive the CAISO’s reclassification of this topic. As the Attachment recognizes, the first is the regulatory context and procedural means involved in this task. This, in turn, involves the continuing coordination between the Commission and CAISO in defining their respective roles in

determining local capacity obligations. The Commission and parties are aware that the CAISO's proposed MRTU tariff contemplates establishing for backstop procurement cost allocation purposes, but not for procurement obligation purposes, an assignment of local capacity requirements that would apply to all load serving entities within the CAISO Control Area. The rationale for this proposal was rooted in the CAISO's experience in operating the grid and the need for consistency among all load-serving entities, regardless of jurisdiction, to avoid potential cost subsidizations. However, the CAISO's proposed tariff also acknowledges that the target level of service reliability to be afforded end-use customers and the means of appropriately maintaining the reliable operation of the grid is a matter for state regulators. The CAISO notes this relationship simply to point out that certain foundational policy issues may require resolution prior to finalizing how long-term local capacity obligations are formulated.

The second practical consideration involves the complexity, and resulting timing implications, of developing a probabilistic approach. A probabilistic or LOLP study approach will be very data-intensive, and will require more than one year to develop. The precise data needed to accomplish the task is dependent on the software and study methodology that is chosen to perform the analysis. New York ISO, PJM, and New England ISO all have resource adequacy criteria based on LOLP analysis. Notwithstanding similar general characteristics between the three entities, their analysis methodologies vary in significant detail. Therefore, an initial requirement is to select which methodology is most appropriate for California. Once a methodology is chosen, a software package would need to also be selected that is the best fit for implementing the methodology. Moreover, the methodology and the software will determine what the data


requirements are, including load data, forecast uncertainty, detail resource data on outages, maintenance schedules, and use limits and operational characteristics, data on demand management, and transmission data. Accordingly, the resolution of these issues can be somewhat circular but once resolved is expected to require significant efforts to collect the necessary data and formulate it to begin the actual study process.

VI. CONCLUSION

The CAISO respectfully requests that the Commission establish the scope of Phase 2 of its RA proceeding consistent with the foregoing recommendations.⁴

Dated: September 15, 2006

Respectfully submitted,

By: Judith B. Sanders 
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Operator Corporation

⁴ The CAISO believes that item II.h should be removed from consideration. In order to ensure consistency across all load serving entities within the CAISO Control Area, the determination of the quantity of aggregate import capacity available for allocation occur in a CAISO initiated process. This is consistent with FERC's order approving the CAISO's Interim Reliability Requirements Tariff (115 FERC ¶ 61,172 (May 12, 2006).)

**ATTACHMENT
TO
SEPTEMBER 15, 2006 COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION
ON ADMINISTRATIVE LAW JUDGE'S RULING REGARDING PHASE 2**

Name of Party:	California ISO	
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Issue	Description of Issue	Currently Proposed Decision Timeframe	Suggested Decision Timeframe*	Commenter's Priority **	Commenter's Preferred Procedure/Method**
I.a	Update RA requirements for CEC load forecast changes for 2007	January-07	January-07	1	Workshop/comments
I.b	Confidentiality	January-07	January-07	1	Comments
II.a	Local RA requirements for 2008	June-07	June-07	1	
II.a.(i)	Local RA based on CAISO 2008 LCR	June-07	June-07	1	Report/comments
II.a.(ii)	Review of LCR study methodology for 2008 or 2009	June-07	March-08	3	Report/comments
II.a.(iii)	Changes to local RAR program implementation	June-07	January-07	1	Report/comments
II.b	Zonal RA requirements	June-07	June-07	1	Workshops/comments
II.c	Coordination of 2008 RA program with CAISO RMR program and/or other backstop authority. Also, consideration of backstop for existing capacity and new capacity.	June-07	June-07	3	Workshops/comments
II.d	Reconsideration of planning reserve margin level	June-07	January-07	1	Workshops/comments
II.e	Qualifying capacity rules	June-07	March-08	3	Report/comments
II.e (i)	QC counting conventions	June-07	March-08	3	Report/comments
II.e (ii)	Coordination of CAISO's QC derates due to performance measurements	June-07	N/A	3	Report/comments
II.e(iii)	Coordination of RA program and generator outage scheduling	June-07	June-07	2	Workshops/comments
II.f*	Demand response program impacts	June-07	December-07	2	Workshops/comments
II.f (i)	Reconsider method of allocating DR, EE, and interruptible program capacity	June-07	December-07	2	Workshops/comments
II.f (ii)	Calculate the local RA capacity from DR, EE, and interruptible programs	June-07	December-07	2	Workshops/comments
II.g	Revisions to load forecast protocols and timing of load forecast submission to the CEC for review/adjustment	June-07	June-07	1	Workshops/comments
II.h	Import levels and allocation process	June-07	N/A	3	Report/comments

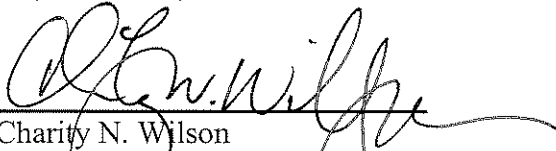
II.i	DR program dispatch by CAISO and / or IOUs	June-07	December-07	2	Workshops/comments
II.j	Coordination of RA program and the CAISO's MRTU	June-07	June-07	3	Workshops/comments
II.k.	Registration/tagging system for RA capacity.	June-07	December-07	1	Workshops/comments
II.l.	Accounting for transmission losses by application of loss factors	June-07	N/A	3	Workshops/comments
II.m	Resolution of Standard Capacity Product Language and Obligations associated with Imports	June-07	June-07	1	Workshops/comments
III.a	Centralized Capacity Market or Capacity Market Alternatives	December-07	December-07	1	Workshops/comments
III.b	Multi-year forward commitment time horizons	December-07	December-07	1	Workshops/comments
III.c	LSE opt-out from cost allocation mechanism	December-07	December-07	3	Workshops/comments
III.d	Resource diversity RA reqs in LSEs	December-07	December-07	2	Workshops/comments
III.e	Market power mitigation	December-07	December-07	3	Workshops/comments
III.f	Probabilistic LCR assessment linked to grid planning process	December-07	March-08	2	Workshops/comments
IV.a	General Order	March-08	March-08	2	Report/comments
IV.b	RA requirements for small and multi-jurisdictional LSEs	March-08	March-08	3	Workshops/comments
IV.c	Long-term monitoring and evaluation of RA program	March-08	March-08	3	Workshops/comments
IV.d	Generation and import deliverability	March-08	March-08	3	Workshops/comments
IV.e	Revision of compliance filing process	March-08	March-08	2	Workshops/comments
IV.f	Urgent program changes triggered by significant/external events	March-08	June-07	1	Workshops/comments
IV.g	Other refinements	March-08	March-08	3	Workshops/comments
IV.h	Respond to CAISO program POU loads and resources	March-08	March-08	3	Workshops/comments

II.f* *The issue of counting Demand Response resources available only during System Emergencies should be addressed by January 2007.*

CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic and United States mail,
Comments of the California Independent System Operator Corporation on Administrative
Law Judge's Ruling Regarding Phase 2 in Docket No. R.05-12-013.

Executed on September 15, 2006, at Folsom, California.



Charity N. Wilson
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