

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

Order Instituting Investigation pursuant to Senate Bill 380 to determine the feasibility of minimizing or eliminating the use of the Aliso Canyon natural gas storage facility located in the County of Los Angeles while still maintaining energy and electric reliability for the region.

Investigation 17-02-002  
(Filed February 9, 2017)

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

**I. Introduction**

Pursuant to the March 9, 2020 *Administrative Law Judge's Ruling Providing Updates on Hydraulic Modeling Reliability Simulations and Sensitivity Cases* (Ruling), the California Independent System Operator Corporation (CAISO) files these comments. The Ruling describes Energy Division's Scenarios Framework, which describes the modeling approach for this proceeding. The Ruling seeks comments from parties on the revisions to the reliability simulations and clarifications to the hydraulic simulations described in the Scenarios Framework. The CAISO generally supports Energy Division's efforts to streamline modeling processes and provides further detailed comments below.

**II. Discussion**

The CAISO appreciates Energy Division staff's efforts preparing and updating the Scenarios Framework and hydraulic simulation assessments. The CAISO provides several questions and/or clarifications that the Commission should address finalizing the Scenarios Framework.

- **Seasonal Assessments:** The CAISO supports Energy Division's proposal to use seasonal rather than monthly assessments to streamline the hydraulic study process. The CAISO understands that the seasonal assessments will include the highest gas usage cases, *i.e.*, testing peak non-core electric generation usage in the summer and peak core customer usage in the winter.

- **Unplanned Outage Assumptions:** The Scenarios Framework does not describe how the Commission will select the most critical unplanned outage assumptions for hydraulic studies. Previously, in the Commission’s January 4, 2019 Ruling, the Commission stated that “staff developed an analytical framework to select the most plausible unplanned outage for the Reliability Assessment and how these outages will affect the Feasibility Assessment.”<sup>1</sup> The CAISO recommends that the Commission make this analytical framework publicly available for party review.
- **Zonal Capacity:** The January 4, 2019 Ruling states that Energy Division staff would “investigate the impact of different types of outages on the zonal capacity.” And that staff would possibly revise the zonal utilization based on findings.<sup>2</sup> The CAISO recommends that Energy Division provide an update on its investigation. Specifically, the Energy Division informs parties whether it will revise the zonal utilization if the findings support different level of utilizations from the proposed Ruling.
- **Assessment Year Input:** Currently, the Ruling provides 28 hydraulic modeling cases that Energy Division intends to run. For cases 15 and 16, the CAISO recommends that Energy Division run a future year other than 2020. The CAISO suggests that these cases use a 2030 assessment year to capture future demand and resource scenarios.
- **Planned Outage Recommendations:** Proposed hydraulic modeling cases 17 through 22 will assess different ranges of inventory at natural gas storage fields. Currently, Energy Division proposes to conduct these studies with unplanned outages. The CAISO recommends that at least one case include plausible “planned” outages as well.
- **Feasibility Studies:** Modeling cases 23 through 28 are feasibility cases that Energy Division staff plans to run. The CAISO recommends that these cases also include a future year (*i.e.*, 2030). Currently, the Ruling only contemplates 2020

---

<sup>11</sup> Assigned Commissioner and Administrative Law Judge’s Ruling Adopting Scenarios Framework and Closing Phase 1 of Investigation 17-02-002, January 4, 2019, Appendix 1.

<sup>2</sup> *Id* at p. 22

assessments for these cases.

- **Relationship with Phase 3 Study Process:** Energy Division staff is conducting the proposed hydraulic assessments as part of the Phase 2 study process in this proceeding. The Commission recently issued the December 20, 2019 Ruling beginning the Phase 3 process of this proceeding as well. The CAISO recommends that the Commission adopt a process to link the results of the Phase 2 study process with the Phase 3 process.

### III. Conclusion

The CAISO appreciates this opportunity to comment on the Scenarios Framework and looks forward to cooperating with the Commission going forward in this proceeding.

Respectfully submitted,

**By: /s/ Jordan Pinjuv**

Roger E. Collanton

General Counsel

Anthony J. Ivancovich

Deputy General Counsel

Anna A. McKenna

Assistant General Counsel

Jordan Pinjuv

Senior Counsel

California Independent System

Operator Corporation

250 Outcropping Way

Folsom, CA 95630

Tel: (916) 351-2249

Fax: (916) 608-7222

[jpjuv@caiso.com](mailto:jpjuv@caiso.com)

Dated: March 24, 2020