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 R.07-01-041 (January 25, 2007)

RESPONSE OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR TO STAFF REPORT ADDRESSING LOAD IMPACT ESTIMATION PROTOCOLS

I. Introduction

The California Independent System Operator Corporation ("CAISO") submits the following comments to the Staff Report Addressing Load Impact Estimation Protocols ("Staff Report"). In footnote 7 of the Staff Report, staff notes that

Joint Staff believe that the development of a load impact protocol for CAISO operational purposes should be undertaken quickly and therefore could be developed in a separate phase of R.07-01-041, prior to the final adoption of the protocols addressed in this report.

The CAISO agrees with staff's perspective, and the CAISO's comments herein are intended to suggest a process for development of Load Impact ("LI") protocols intended to enable IOU demand response programs to comport with CAISO operational needs.

II. Joint Staff, in Collaboration with the CAISO, Should Develop an Operational Load Impact Estimation Protocol Straw Proposal

The CAISO believes that it has a shared interest with the Commission in realizing the full value of demand response and in ensuring that demand response resources contribute effectively to the reliable operation of the grid. This is supported by the Commissions' recent statement in D.07-06-029 that "R.07-01-041 was established to address various DR program issues, including consideration of modifications to DR programs needed to support the CAISO'S efforts to incorporate DR into market design protocols."

Significantly, in footnote 12 in the D.07-06-029, the Commission cites language in a FERC Order stating that

We believe that the CAISO must be allowed to make technical determinations as to whether a particular resource (whether a generator or demand response) can support grid reliability. However, we agree that the CAISO should respect California's determination that energy efficiency and demand-side resources receive the highest priority in meeting future reliability needs. We therefore direct the CAISO to coordinate with the [California Public Utilities Commission] to minimize the potential for disagreements as to whether particular demand-side resources qualify on a technical basis in meeting resource adequacy requirements. (FERC "Order") Granting In Part And Denying In Part Requests For Clarification And Rehearing," issued April 20, 2007 in FERC docket No. ER06-615 at p. 222, ¶ 560, cited in CPUC D.07-06-029 at fn12, pp 41-42.)

Accordingly, the Commission recognizes that the CAISO can make is own determinations regarding the suitability of DR resources resulting from DR programs, and that the CAISO is committed to coordination with the Commission to maximize the efficacy of those DR resources.

The CPUC, from its own perspective, described the current disconnect between California IOU demand response resources and the wholesale markets in the CPUC's decision closing out Rulemaking 02-06-001, the CPUC's first demand response policymaking proceeding:

One of the struggles that has become clear over the course of this proceeding is between our desire to promote price-responsive demand and how the utilities and the CAISO treat demand response resources for purposes of resource planning

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¹ D.07-06-029 (Opinion on Phase 2--Track 1 Issues), issued June 21, 2007 at p. 41].

and meeting resource adequacy standards. Unlike energy efficiency, which has a long history of success, adopted measurement protocols, and is well integrated into the resource planning process, demand response programs have a shorter history, are not well integrated into the planning process, and do not have adopted measurement and evaluation protocols. At this time, it appears that the CAISO continues to purchase energy in the market in order to ensure sufficient energy in the event that all demand response resources do not deliver. It is our belief that until the industry develops further trust that demand response will deliver demand reductions when needed, demand response will continue to be dismissed in the resource planning and acquisition process. In order to build that trust, we need to develop industry protocols for measuring load response capability and results so that the ratepayers are not paying twice for the same capacity, once for demand response programs, and then again for short-term resource acquisition by the CAISO. In addition, more precise demand reduction estimates derived from an accepted measurement methodology are a necessary prelude to performing accurate cost-effectiveness analysis.²

This background is important in highlighting where we are and where we need to go. The CAISO acknowledges the purpose of the Joint Utilities' DR load impact estimation protocol, which is to provide guidance on "methods that can be used to develop load impact estimates for use in *long term resource planning* (emphasis added)."

Understandably, developing a longer-term load impact protocol is important and it may also be applicable when determining the quantity of demand response resources that should be considered in grid planning studies. However, for the near-term, and to help the CPUC accomplish the above-stated objective for this rulemaking, of achieving "modifications to DR programs needed to support the CAISO'S efforts to incorporate DR into market design protocols," the CAISO encourages the CPUC to include within this rulemaking a phase or track which develops operational load impact

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² D.05-11-009 (Decision Closing this Rulemaking and Identifying Future Activities Related to Demand Response), issued November 18, 2005 in CPUC Rulemaking 02-06-001 (Filed June 6, 2002) [the CPUC's first DR proceeding.]. The CAISO has added underlining in the excerpt, for emphasis. The decision can be viewed on the CPUC's Internet Web site at

 $[\]underline{http://www.cpuc.ca.gov/word_pdf/FINAL_DECISION/51376.doc}\;.$

³ Staff Report, p. 13.

protocols for the purpose of incorporating demand response into the wholesale electricity

markets and maintaining day-to-day grid reliability.

The CAISO proposes that Joint Staff, in collaboration with the CAISO, and

supported by appropriate and available third party expertise, develop a straw proposal—

for vetting by the parties—that sets forth operational load impact protocols and their

appropriate application to demand response programs so that these demand response

resources are useful to the CAISO in conducting its day-to-day business of maintaining

reliability and the IOUs in their daily planning function. The straw proposal and the

associated procedural schedule could be vetted through submitted comments and a

workshop process for timely adoption of an end-result operational load impact protocol

by the Commission.

Dated: October 24, 2007

Respectfully submitted,

CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION

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CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2007. I served on the parties listed on the Service List for Proceeding R.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 24, 2007 at Folsom, California

/s/ Melissa Hicks

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