BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rule making to Consider Refinements to and Further Development of the Commission's Resource Adequacy Requirements Program.

Rulemaking R.05-12-013 (December 15, 2005)

REPLY COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR TO COMMENTS ON STAFF'S MODIFIED CENTRALIZED MARKET PROPOSAL

Pursuant to the September 17, 2008 Notice to Parties by the Assigned Administrative Law Judge for the California Pubic Utility Commission ("Commission" or "CPUC"), the California Independent System Operator Corporation ("CAISO") submits the following reply comments to the comments filed by parties on October 1, 2008 regarding Energy Division Staff's "Additional Information on the Modified Centralized Market Proposal As Presented in California Public Utilities Commission Proceeding R.05-12-013" dated September 12, 2008 ("Updated MCM Proposal").

I. INTRODUCTION

In its initial comments, the CAISO emphasized the importance of the Commission acting expeditiously to adopt and initiate development of a multi-year forward Resource Adequacy program. At the same time, the CAISO recommended that the Commission not adopt Staff's Updated MCM Proposal as a basis for CPUC's long-term Resource Adequacy ("LTRA") framework. Instead, the CAISO expressed support for the conceptual proposal offered by the California Forward Capacity Market Advocates ("CFCMA")¹ as representing a comprehensive, well-structured model that

See Comments of the California Forward Capacity Market Advocates on Staff Report Providing Recommendations on Capacity Market Structure, filed in this docket on February 29, 2008, and Reply

would be a suitable framework for California's LTRA program, would not compromise the CPUC's ability to direct the bilateral procurement activities of its jurisdictional entities, and would be the best proposal offered in this proceeding to serve as the starting point for a detailed central capacity market design process.

Based on the comments filed by the other parties on October 1, 2008, the CAISO's positions and recommendations to the Commission have not changed. First, the CAISO continues to believe that it is critical for the Commission to adopt in this proceeding a multi-year forward framework for the procurement and identification of Resource Adequacy ("RA") capacity to serve consumers under the jurisdiction of the Commission and within the CAISO Balancing Authority Area. The need for a multi-year forward process for estimating requirements and procuring RA capacity has broad support, even among parties with otherwise diverse views on a centralized capacity market, including CFCMA, Pacific Gas & Electric Company, Calpine Corporation ("Calpine"), Constellation Energy Commodities Group, Inc. and Constellation NewEnergy, Inc. ("Constellation"), and Energy Division Staff in its Updated MCM Proposal.²

Second, the CAISO believes that the CFCMA proposal offers a solid basis for developing an effective central capacity market design. It will provide transparent prices

Comments of the California Forward Capacity Market Advocates on Staff Report Providing Recommendations on Capacity Market Structure, filed on March 14, 2008.

See e.g., Comments Of CFCMA On Energy Division Staff Filing "Additional Information On The Modified Centralized Market Proposal", October 1, 2008, p. 9; Pacific Gas and Electric Company's Comments on the 'Modified Centralized Market' Proposal, October 1, 2008, pp. 1-2; Supplemental Comments Of Calpine Corporation On Staff's Modified Centralized Market Proposal, October 1, 2008, p. 3; Supplemental Comments Of Constellation Energy Commodities Group, Inc. and Constellation NewEnergy, Inc. On The Energy Division Staff Filing Of Additional Information On The Modified Centralized Market Proposal, October 1, 2008, p. 5; Updated MCM Proposal, pp. 6-7.

and needed price signals for investment decisions and economic trade-offs among investments in new generation, demand response and transmission. In comparison, many features of Staff's Updated MCM Proposal remain unclear, and the CAISO is particularly concerned that the proposal bifurcates the market for RA capacity as well as the capacity product itself, which could create pricing outcomes and contracting and investing incentives that run counter to the state's long-term energy and environmental objectives. Significantly, none of the parties' October 1 comments unconditionally support Staff's Updated MCM Proposal. It accordingly appears to the CAISO that the CFCMA proposal is not only a workable, well-structured model suitable for California's LTRA program, but it is also the preferred framework of the consensus of parties who favor adoption of a centralized capacity market. The CAISO, therefore, reiterates its recommendation that the Commission adopt a central capacity market in its LTRA framework, and designate the CFCMA proposal as the starting point or baseline for a comprehensive design effort.

II. COMMENTS OF THE BILATERAL TRADING GROUP

 A Multi-Year Forward RA Program Will Be More Supportive Of Investment Decisions Than The Current One-Year Ahead RA Program Espoused By BTG

In its October 1 comments, the Bilateral Trading Group ("BTG") contends that the RA program has been successful since its inception and has improved as the result of Commission-ordered modifications. BTG further argues that the RA program is the preferred design to achieve the preferred end-state of an energy-only market.

As evidence of their contention that the current RA program is successful as is and should not be substantially enhanced, BTG cites to the CAISO's August 2008

Market Performance Report to support its claim that the CAISO has not incurred any expenditures in 2008 for the commitment of units in the Day-Ahead Must Offer Obligation ("MOO") process established by the Federal Energy Regulatory Commission ("FERC").³ BTG concludes from this that the RA program has completely covered the CAISO's Day-Ahead commitment needs and that there is no need to modify the RA program (other than to make minor tweaks) under these circumstances by adopting either a multi-year forward RA program or a centralized capacity market mechanism.

BTG's focus on the RA results of a single year is flawed. From June 1, 2006⁴ through December 31, 2007, the CAISO made 300 Day-Ahead Commitments of FERC MOO units.⁵ These results for June 2006 through December 2007 present a very different picture than the 2008 results, and than BTG portrays in its October 1 comments. Moreover, 2008 has been characterized by lower peak loads and generally milder temperatures than either 2006 or 2007.⁶ It is therefore inappropriate and risky to

The Market Performance Report cited by BTG does not support their proposition. The report states that "[t]here were no Day-Ahead FERC unit commitments in August". Contrary to BTG's claim, the CAISO made a Day-Ahead commitment of a FERC MOO unit on April 27, 2008. Also, on June 2, 2008, the CAISO committed two non-RA units, and those commitments resulted in month-long designations of capacity (and monthly capacity payments) under the CAISO's Transitional Capacity Procurement Mechanism.

June 1, 2007 is the date the CAISO implemented the Reliability Capacity Services Tariff ("RCST") capacity backstop mechanism.

In 2006, the CAISO paid approximately \$163.5 million in Minimum Load Cost Compensation ("MLCC") and Imbalance Minimum Load Energy payments to FERC MOO resources. In 2007, the CAISO paid approximately \$64.3 million in MLCC and Minimum Load Imbalance Energy payments to FERC MOO units. See 2007 Annual Report Market Issues & Performance at 6.6. During the last six months of 2006, the CAISO paid approximately \$14.3 million in daily capacity payments to FERC MOO units under the RCST, and in 2007, the CAISO paid approximately \$25.9 million in daily capacity payments. *Id.* at 6.12.

To date 2008 has been a mild year both load wise and temperature wise. The peak load so far in 2008 has been 46,896 MW, compared to peak loads in 2006 and 2007 of 50,270 MW and 48,615 MW, respectively. Also the report that BTG cites -- the CAISO's Market Performance Report for August 2008 - shows that average hourly load has been lower in every month of 2008, except one, compared to 2007. Similarly, the average daily peak has been lower in all but two months. In 2008, the CAISO has simply not needed to utilize non-RA capacity to meet reliability needs. That was not the case in prior years.

evaluate the effectiveness of the current RA program -- and to make fundamental decisions on the design of an LTRA program – based on the results of a single year.

Perhaps most importantly, BTG's argument, and its proposal to maintain a single-year-ahead bilateral approach, misses the central point of this proceeding, which is to consider the appropriate LTRA framework. BTG refers to an "energy only" market as its preferred end-state RA framework, but offers not even a conceptual model of how such a market would work in the California context, nor a strategy or program for moving to such a market.⁷ Thus, BTG's recommendation for an LTRA framework is essentially to have no LTRA framework at all.

The purpose of an LTRA framework is to solve a multi-year investment problem, not simply to meet current-year reliability needs. BTG's focus on the results in a single year fails to recognize the purpose of LTRA planning, namely, to ensure that there will be sufficient capacity investment early enough to meet projected loads and reliability needs in future years. Recognizing this critical objective, neither the CAISO nor any of the investor owned utilities ("IOUs") support BTG's proposal to continue the year-to-year RA framework. Rather, the CAISO, the three IOUs, CFCMA, Calpine, Constellation, and Staff in its Updated MCM Proposal, all agree that a multi-year ahead RA framework for assessing RA capacity requirements and procuring RA capacity on a forward basis is a vital component of an effective long-term RA program. A multi-year ahead framework will allow for timely investment decisions based on meaningful cost-benefit comparison among viable alternatives, including new generating plants, retirement or

⁷ It is noteworthy that models of "energy only" approaches that have been adopted or considered in other parts of the United States rely on much higher spot market bid caps than have been adopted for the CAISO markets over the next three years. We discuss this element of BTG's argument in a later section of this Reply.

repowering of existing plants, new demand response technologies and transmission upgrades. A multi-year ahead RA framework is necessary to ensure that investment in new infrastructure is made in time for that new infrastructure to be on-line when it is needed.

The CAISO believes that a centralized capacity market structure will be the most effective, fair, and transparent way to attract competitive market-based investment and accomplish related state policy objectives, while preserving full state authority over RA as contemplated in the Energy Policy Act of 2005.

2. A Centralized Capacity Market Will Not Diminish CPUC Authority Nor Undermine State Energy and Environmental Policy Objectives

Contrary to BTG's comments, a centralized capacity market structure will not cause the Commission to relinquish authority over RA to FERC. The CPUC will have continuing authority over the bilateral procurement of its regulated Load Serving Entities ("LSEs"), which will in no way be diminished by the adoption of a centralized capacity market framework.

BTG also claims that a centralized capacity market will result in vastly higher costs to consumers, in part due to a central auction clearing price. This assertion rests on the presumptions that under the bilateral model (1) LSEs will be able to pay existing resources less for RA capacity than they pay for new investment, and (2) that paying less to existing resources even if feasible would be unequivocally advantageous to consumers. The CAISO disagrees with both presumptions. First, the purported savings would be eroded both by suppliers who will calculate their offer prices to try to earn their estimates of the fair market value of their capacity, and by the activities of financial intermediaries that will offer profitable market-making services to buyers and sellers to

compensate for the absence of a transparent market. Second, contrary to assertions that paying a market clearing capacity price to existing resources will prevent dirty and inefficient resources from retiring, the CAISO would point out that the ability to earn a market clearing price could enable such resources to invest in environmental upgrades and repowering which could meet state environmental objectives at lower cost than driving them to retire and replacing them with new resources. Tightening environmental restrictions and rising costs of compliance (e.g., greenhouse gas allowances) will tend to limit the output of the inefficient or dirty plants. Instead of letting them slip into retirement, however, the recent CAISO study on renewable integration⁸ has pointed out that they may be needed primarily for ancillary services, such as regulation, and load following to support the shift of the supply fleet to include increasing amounts of intermittent renewables. In this case, paying them a sufficient capacity payment will support the objective of meeting environmental goals reliably and cost effectively.

3. The BTG Proposal Does Not Provide The Clearest Path To An Energy-Only Market

BTG asserts that a centralized capacity market is incompatible with, and will preclude an eventual transition to, their idea of a gold-standard "energy-only" market. The CAISO does not object to eventually transitioning to an energy-only market, but strongly disagrees that adopting an effective LTRA framework including a central capacity market will impede such a transition. Quite the contrary, a well-designed central capacity market can facilitate a smooth transition as spot market bids and prices are allowed to rise to levels that eliminate the need for RA capacity payments. As the

⁸ CAISO, Integration of Renewable Resources (November 2007). Available at http://www.caiso.com/1ca5/1ca5a7a026270.pdf.

CAISO observed in prior comments. based on the experience of PJM Interconnection. LLC ("PJM") and ISO New England, Inc. ("ISO-NE"), market-based investment does not appear in energy-only markets with bid caps of \$1,000 per MWh, i.e., where there are no meaningful capacity payments. Accordingly, it appears that without bid caps in the multi-thousand dollar range – and credible assurances to investors that policy makers will not intervene when prices hit that range for hours at a time under peak conditions – new investment in response to an energy-only market in California is a vision of the more distant future. 10 However, nowhere does BTG suggest that State policy makers will be willing to accept high energy prices for a substantial period of time with only nominal mitigation. In any event, the energy-only markets of the Electric Reliability Council of Texas and the Midwest Independent System Operator, Inc., are still too new to provide any evidence of success in attracting investment, whereas the ISO-NE's recent first run of its Forward Capacity Market ("FCM") cleared the full quantity of demanded capacity at the price floor, including a substantial quantity of new investment in demand response.

If an energy-only market is eventually determined by policy makers to be suitable for California, then bid caps will need to be lifted to allow spot market prices to rise.

When that happens, since suppliers of capacity in a competitive central capacity market will calculate their offer prices to reflect their expected earnings in the spot markets, the prices in the centralized capacity market will fall commensurately as spot market

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⁹ Reply Comments of the CAISO on Staff Recommendations on Capacity Market Structure, March 14, 2008, pp. 4-5.

It should be noted that the energy bid cap in the new CAISO spot markets being implemented will rise to \$1,000 only in the third year of operation, i.e., starting in the first quarter of 2011, and there are no plans at this time for bid caps to be raised further.

earnings rise and reduce the need for RA capacity payments.

4. BTG Fails To Address The Significant Issue Of CAISO Backstop Procurement

BTG fails to address the significant issues associated with developing a permanent CAISO backstop procurement mechanism, which would be required if the current RA program were to be continued indefinitely instead of adopting a central capacity market. The CAISO points out that the recently filed Interim Capacity Procurement Mechanism ("ICPM") is intended as an "interim" backstop mechanism and as such has a definite sunset at the end of 2010. Thus, an indefinite extension of the current RA framework would require a reopening of the issues debated in the recent ICPM stakeholder process. The BTG proposal does not offer suggestions on how to structure a CAISO backstop procedure that would be more permanent than ICPM, nor does it acknowledge that all of the controversies that emerged in the ICPM design process would need to be reopened. For example, BTG leaves unresolved the key issue of how the CAISO should determine the backstop price to pay for additional capacity to compensate for LSEs that are deficient in their annual RA showing. The recently-filed ICPM proposal, which is still awaiting a FERC decision, uses an administratively determined uniform price based on the higher of \$41/kw-year or the actual going forward costs of the designated resource plus a 10 percent adder (subject to approval by FERC of the resource's filed costs). However, market participants have challenged this proposal, so that the final FERC-approved backstop pricing rule is not known at this time. In particular, generators have sought a much higher backstop price based on recent estimates of cost of new entry. In the lengthy CAISO stakeholder process conducted during much of 2007 to determine this interim backstop price, RA

market participants, including both buyers and sellers, repeatedly noted that the current transparent backstop price -- under the prior backstop mechanism known as the Reliability Capacity Services Tariff ("RCST") as well as the present Transitional Capacity Procurement Mechanism ("TCPM") -- has a substantial effect on bilateral contracting in the forward RA market.

Under the current purely bilateral RA program the backstop price is the known deficiency charge (and is potentially augmented by CPUC penalties for jurisdictional LSEs), thus making it the one visible benchmark for bilateral contract negotiation. This outcome is not efficient, because there is only one fixed transparent reference price in all locations. A bulletin board will help improve price transparency, but will not fully resolve the matter of the effect of the CAISO backstop price on the bilateral RA capacity market. As a result, the prospect of having to develop a permanent CAISO backstop mechanism for a purely bilateral LTRA framework will open contentious debates on backstop pricing, a prospect which the BTG's comments ignore.

III. OTHER COMMENTS

1. Difficulty Of Implementing A Multi-Year Forward RA Showing Under A Purely Bilateral RA Framework

PG&E's comments express a preference for a bilateral RA model without a centralized capacity market, but recognize the need for a multi-year forward capacity commitment process. The CAISO believes that a multi-year forward RA capacity process based entirely on bilateral capacity procurement and LSE showings is unworkable. Under such an approach, one issue likely to be extremely contentious, among others, will be how to establish enforceable four- or five-year forward RA procurement obligations for LSEs, particularly smaller LSEs whose business model

depends on the Direct Access program and who therefore face substantial uncertainty regarding their load obligations four-to-five years in the future. A central capacity market solves this problem for smaller LSEs who can meet all their RA requirements through the central market and simply pay for that capacity based on their actual load in each delivery month. The CAISO believes that a multi-year forward long-term RA design that is purely bilateral without a centralized capacity market would adversely impact the viability of Direct Access.

In addition, as the CPUC knows, a central fixture of today's purely bilateral RA framework is the specification of RA requirements for each LSE, at the system level and for each local capacity area, in advance of the required showing. Under the current one-year-ahead RA time horizon, the uncertainty associated with such specification may be tolerable; however, the magnitude of the uncertainty will vastly increase if LSE requirements must be specified four-to-five years ahead of the delivery year. In contrast, under a multi-year forward centralized capacity market structure there would be no need to specify individual LSE requirements at the time the primary capacity auction is conducted. This would not, of course, preclude the CPUC specifying and enforcing procurement and showing requirements for its regulated LSEs.

What the centralized capacity market would provide is the simplification of being able to determine capacity needs at the system and local levels for all LSEs collectively and to procure in a transparent manner the difference between those collective LSE requirements and the total RA capacity self-provided by LSEs to the centralized capacity market, without having to assign that difference to a bilateral procurement

shortfall of any particular LSEs until the centralized capacity market settlement is conducted at the time of delivery.

IV. CONCLUSION

For the foregoing reasons, the CAISO respectfully requests that the Commission adopt the CAISO's positions and recommendations in this matter, and establish a long-term RA framework consistent with the discussion in these reply comments.

Respectfully submitted,

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151

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT ON OCTOBER 8, 2008, I SERVED, BY ELECTRONIC MAIL AND UNITED STATES MAIL, A COPY OF REPLY COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR TO COMMENTS ON STAFF'S MODIFIED CENTRALIZED MARKET PROPOSAL IN DOCKET NUMBER R.05-12-013.

DATED at Folsom, California on October 8, 2008.

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