



October 5, 2004

Attn: Commission's Docket Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Docket # R.04-04-003- Order Instituting Rulemaking to Promote Policy and Program
Coordination and Integration in Electric Utility Resource Planning

Dear Clerk:

Enclosed please find an original and five copies of Reply Comments of the California Independent System Operator Corporation on the Alternate Draft Decision of Commissioner Lynch Regarding Resource Adequacy in the above-referenced docket.

Please date stamp one copy and return to California ISO in the self-addressed stamped envelope provided.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Grant A. Rosenblum'.

Grant A. Rosenblum
Regulatory Counsel

Cc: Service List

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

Order Instituting Rulemaking to Promote)
Policy and Program Coordination and)
Integration in Electric Utility Resource)
Planning)
_____)

R.04-04-003

**REPLY COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
ON THE ALTERNATE DRAFT DECISION OF COMMISSIONER LYNCH
REGARDING RESOURCE ADEQUACY**

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Dated: October 5, 2004

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The California Independent System Operator Corporation (“CAISO”) submits these reply comments to address, and hopefully clarify, one issue – the role of intra-control area system contracts (or “Firm LD contracts”) in the resource adequacy requirement.¹

The core objective of resource adequacy is to ensure that capacity is committed to serve California load. Intra-control area system contracts that do not specify the units the supplier intends to rely on to “back” the contract undermine that core objective. Without the specification of a particular resource or resources supporting the contract, there is no way to ensure that the generation capacity is not being double-counted for resource adequacy purposes, i.e., used to supply the energy contract and a separate availability contract to different LSEs. The issue is not whether Firm LD contracts are reliable, dependable, and beneficial to the consumers, but to ensure that other capacity contracts (e.g., availability contracts) that are sold and used to satisfy a LSE’s obligation do not use the same capacity that is “nominally slated” by the seller of the LD contract. By specifying nominal resources supporting a Firm LD contract, this double counting gaming possibility is eliminated. Moreover, the supplier is committing that capacity to California


¹ By only addressing this issue, the CAISO does not imply that it agrees with all other positions taken by interested parties in their opening comments on the Lynch Alternate. In this regard, the CAISO continues to advocate for rejection of the Lynch Alternate generally, and in favor of those changes to the Draft Decision set forth in the CAISO’s prior comments on both the Draft Decision and Lynch Alternate.

through the contractual requirement, adopted by both the Draft Decision and the Lynch Alternate, to schedule or bid into the CAISO markets and the CAISO can determine whether the capacity from those units is oversubscribed. This “portfolio” approach allows for the identification of a significant number of units or portions of units. Finally, while the identified units must comply with the contractual provision to make themselves available to the California market, the supplier need not meet its delivery obligation from those units, but may purchase economy energy. If other cheaper resources become available on a given day, then the supplier of the Firm LD contract may use it to satisfy its obligation.

Thus, the CAISO’s opposition to intra-control area system contracts is limited to those contracts that do not specify the unit(s) the supplier possesses to support the contractual obligation and, consistent with this position, reads both the Draft Decision and Lynch Alternate as being similarly limited.

October 5, 2004

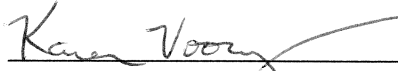
Respectfully Submitted:

By: 
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CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic mail, a copy of the foregoing Reply Comments of the California Independent System Operator Corporation on the Alternate Draft Decision of Commissioner Lynch Regarding Resource Adequacy to each party in Docket No. R.04-04-003.

Executed on October 5, 2004, at Folsom, California.

A handwritten signature in black ink, appearing to read "Karen Voong", written over a horizontal line.

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