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 DRAFT DECISION OF ALJ WETZELL REGARDING OPINION ON RESOURCE ADEQUACY REQUIREMENTS

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In accordance with Rules 77.5 of the Commission's Rules of Practice and Procedure, the California Independent System Operator Corporation ("CAISO") respectfully submits its reply comments on Administrative Law Judge ("ALJ") Wetzell's draft decision entitled "Opinion Regarding Resource Adequacy Requirements," mailed September 27, 2005, in the above-referenced proceeding ("Draft Decision").

A. Refinement of Local Capacity Requirements Allocation

The CAISO takes this opportunity on reply to refine its vision for how resources will be made available for commitment prior to the effective date of the CAISO's Market Redesign and Technology Upgrade ("MRTU") project and how that process may effect the allocation of costs associated with Local Capacity Requirements ("LCR"). As noted in its opening comments, the Commission's final order should simply include a requirement that RA resources and future RA contracts conform to the CAISO's RA Tariff provisions.

1. Current FERC Must-Offer Process Will Apply Under A Resource Adequacy Must-Offer Obligation to the Maximum Extent Possible

Many parties addressed in opening comments the need to continue the current must-offer obligation ("MOO") imposed by the Federal Energy Regulatory Commission ("FERC"). In this regard, the CAISO emphasizes that, prior to MRTU, if the FERC MOO goes away, the CAISO intends to continue to utilize the current MOO provisions of its Tariff to the maximum extent practicable. The CAISO does not envision altering its systems or processes to accommodate the potentially 8-month period between implementation of RA (June 2006) and MRTU (February 2007). If approved by FERC, the primary difference between the FERC MOO and an RA MOO will be the identity of resources subject to the obligation. Instead of the current application with all non-hydro Participating Generators being subject to FERC MOO, under an RA MOO, the MOO will apply only to those resources listed in LSEs' RA reports, with due consideration of physical and regulatory limitations of the underlying resources. Accordingly, prior to implementation of MRTU, all RA resources will be subject to a real time offer obligation to the extent of their RA obligation, *if not scheduled, and unless provided a waiver through the CAISO's current day-ahead Must-Offer Waiver Process.* The October 2004 decision recognized this need by establishing a day-ahead availability requirement.[1]

2. Allocation of LCR Costs

Broadly, there are three cost categories arising from LCR: (1) capacity costs, (2) commitment costs, and (3) dispatch costs above the unit's minimum commitment level. Existing CAISO and other

[1] The CAISO is not suggesting by this discussion that it does not have backstop procurement authority for incremental capacity requirements or to mitigate market power.

market mechanisms largely address the second and third categories. For example, and consistent with the foregoing discussion, even without a FERC MOO, the CAISO intends to seek FERC approval to preserve in its Tariff those provisions relating to calculation and allocation of MOO commitment costs- i.e. start-up and minimum load cost compensation.[2] The allocation of these costs is currently pending FERC consideration and approval in the CAISO's Amendment 60 proceeding.[3] Other commitment costs may be recovered under reliability services tariff provisions either approved or pending approval where the IOU has scheduled a resource pursuant to the requirements of the CAISO's market operations procedure titled M-438. Similarly, dispatch costs can also be addressed through existing mechanisms. Simply put, whether the scheduling coordinator for the resource is the LSE or resource owner, the CAISO will dispatch the unit either in-sequence and compensate the unit according to the market-clearing price or out-of-sequence according to its bid, subject to market power mitigation rules. If the unit is scheduled by the LSE, the resource is either "in-the-money" and is economic under anticipated market conditions or it is "out-of-the-money" and its costs will be recovered under a reliability services tariff similar to M-438 procedures.[4]

Capacity costs arise from the resource's willingness to abide by the RA availability requirements. Imposing an obligation directly on LSEs to procure local capacity resources in proportion to their load in the local capacity area would avoid the need to develop an allocation method. The CAISO has delineated the geographic boundaries of the local capacity areas.[5] The Draft Decision should be modified to require LSEs to provide the CEC with load data for 2005, i.e., current customer, in each local capacity area. Each LSEs' obligation for 2006 will be based on its proportionate share of load within the local capacity area in 2005. This could supplement that currently proposed load forecasting provisions of the Draft Decision by requiring a current customer approach for the limited purpose of allocating the local capacity requirement to the respective LSEs with load in each load pocket.

B. Top-Down Refinements Offered by the Joint Parties

The CAISO appreciates the effort of the Joint Parties to further elaborate on the implementation details of the "top-down" approach adopted in the Draft Decision. The CAISO generally believes the recommendations offered by the Joint Parties enhance the ability of the Mirant top-down approach to achieve the Commission's objective that RA resources be available to the CAISO to reliably operate the grid. In particular, the CAISO makes the following observations and suggestions:

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[2] In the context of an RA MOO, it should be noted that the CAISO does not foresee LSEs foregoing scheduling RA resources in order to pass commitment costs on to other LSEs in accordance with the ultimate Amendment 60 cost allocation because of the CAISO's proposed 95% day-ahead scheduling requirement. See, FERC Docket No. ER05-1502-000.

[3] FERC Docket Nos. ER04-835-000 and EL04-103-000 (consolidated).

[4] It therefore appears that an LSE without a reliability service tariff would rely on the must-offer waiver process to commit local RA units until MRTU becomes operational.

[5] This information was submitted to the Commission as part of the CAISO's September 23, 2005 Motion to Augment the Record.

- The CAISO agrees that the Joint Parties' categorization of resources into 80 hours for "critical peak," 160 hours for "super peak," and 380 hours for "peak," provide a transparent and objective criteria based on current practice in the marketplace.

- The calculation formula for Maximum Cumulative Capacity ("MCC") set forth in footnote 16 of the Joint Parties' comments must be corrected to be consistent with the Mirant proposal and to ensure reliability. The formula should be 1-(Load+PRM at hour X [i.e., 160 hrs.]/Load+PRM at peak). In what looks like an inadvertent error, the Joint Parties incorrectly exclude the PRM in the numerator. At any point in time, the CAISO requires capacity that is not only capable of operating to cover load, but also able to operate in accordance with Ancillary Services requirements, i.e., convert the capacity to energy under various parameters. Under the Joint Parties' calculation, the formula would not ensure that there is sufficient capacity able to "operate" to cover both load and Ancillary Services.

- The Joint Parties state that RA resources will be assigned to categories based "on their physical or contractual limitations, which limitations are represented as the number of hours in each month the capacity from these resources can be made available to the CAISO." (Joint Parties at 4.) This is accurate given the anticipated use of existing contractual resources to satisfy the RA requirement. However, the Draft Decision should include the Joint Parties' clarification that all resources developed or contracted for after September 27, 2005 for meeting an LSE's RA obligation must be made available to the CAISO for their full operational capability.[6] Contractual limitations, i.e., 6x16 contracts for internal resources whether or not Firm LDs, will not be accepted.

The final clarification above is critically important. As discussed during the workshops, the CAISO can experience a high load hours during non-peak days of the month. For example, the 69th and 72nd highest peak hours of the month for September 2004 occurred on Sunday the 5th. Therefore, it should be noted that under the Joint Parties proposal where contractual limitations dictate the availability obligation, the critical peak, super peak, and peak products would not have been available to serve load because these products are explicitly not required to be available during the seventh day of the week. The only potential products available to the CAISO would be the 24 hour unrestricted resources.

C. Allocation of Import Capacity

Appendix A to SCE's Opening comments specifies that "[i]n no case will the total ACIC [import capacity] allocated to an LSE exceed their relative peak load share times the total available ACIC [import capacity]." However, some CAISO Participating Transmission Owners ("PTOs") may have turned over more import capacity to the CAISO than their relative peak load share, and they may have existing resources in their resource portfolios that rely on an amount of this capacity that exceeds their relative peak load share. Footnote 17 in SCE's appendix proposes that "Evergreen Rights will be allocated to parties with existing generation or contracts that utilize specific import paths." This appears to conflict with the proposed methodology in the Draft Decision for screening the deliverability of DWR contracts

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[6] Joint Parties at 8.

based on their historic path usage. Because of these conflicts, the CAISO does not support these two provisions in SCE's proposal.

Both PG&E and SCE also seek clarifications to the Draft Decision. PG&E proposes that only existing contracts in effect as of September 27, 2005 should be grandfathered. This provision would create significant uncertainty with respect to deliverability for all new contracts that exceed the contract holder's relative peak load share of a particular path. For this reason, the CAISO does not support this clarification. SCE proposes that "LSEs should demonstrate their intended use of imports to meet their RAR obligation on specific paths and provide data quantifying and supporting this import use one month in advance of the month-ahead RAR showings". The CAISO supports this demonstration proposed by SCE. However, there should also be a demonstration and allocation in the year-ahead time frame to ensure that in the event that some of the imports are not deliverable, the LSE has sufficient time to identify additional resources.

D. The Assessment of Penalties Should Be Modified and Clarified

Several parties, including Mirant and West Coast Power, question the efficacy of adopting a "baseline penalty of 150% of the monthly cost of new capacity for 2006." (Draft Decision at 91.) The CAISO harbors the same doubts and recommends that the Commission reject a 2006 transition by adopting the 300% cost of new capacity penalty for the first year. The Draft Decision correctly recognizes that rationale underlying the penalty is to induce compliance. However, the RA requirement must have an economic consequence or it will fail.

The Commission's use of monthly peaks to establish the RA obligation will significantly diminish the effectiveness of the transitional penalty during summer 2006. Because the RA obligation is calculated monthly, it is possible that capacity values for the non-summer months will be low when capacity is relatively more plentiful. As such, resources needed for the summer, whether baseload or peakers, will attempt to recover their necessary contribution to going-forward fixed costs in the summer months only, rather than over the course of the entire year as is done in other installed capacity-type markets. The likely consequence is that the value of capacity during the summer may near or exceed the 150% penalty. Thus, the Commission should adopt the 300% penalty for 2006 as a better approximation of the economic trade-off between compliance and non-compliance with the RA requirement.

Further, as both SCE and PG&E point out, under Public Utilities Code § 2104, actions to recover penalties are to be brought in California's superior courts and any recovery shall be paid into the State's General Fund. (SCE Comments at 10 and PG&E Comments at 6.) The need to pursue penalties through superior court actions imposes a barrier to their efficient collection and effectiveness as a deterrent. PG&E's concern that assigning the monies collected to the General Fund fails to recognize the need to cover the costs of backup capacity procurement is valid. If the penalty sums are unavailable to compensate the entity responsible for backup capacity procurement, the CAISO or other entity will be compelled to either socialize the costs of its backup procurement or impose an additional penalty on those

LSEs causing the capacity shortfall. Accordingly, the Commission must expeditiously address the process by which it will impose penalties in subsequent RA workshops.

E. The CAISO Concurs with PG&E that the Definition of Imports Must Be Clarified

The Draft Decision exempts "firm import LD contracts" from the sunset and phase-out provision applicable to Firm LD contracts generally. (Draft Decision at 65.) The basis for this exemption is that firm import LD contracts "do not raise the issues of double counting and deliverability." (*Id.*) For this justification to hold, the CAISO strongly agrees with PG&E that the Draft Decision must be clarified to specify that, in order to qualify as an import, the firm delivery point must be either a delivery point at an inter-tie or outside the CAISO Control Area. (See, PG&E Comments at 4.) PG&E correctly states that if an import may be delivered to the CAISO Control Area generally, i.e., NP15, that import is indistinguishable from an in-area Firm LD contract. Furthermore, the parties have distinguished that imports must come with an obligation for the sending control area to provide operating reserves.

F. Counting Resources on Planned Outage

There is an omission in the Draft Decision that must be addressed to facilitate the allocation of risk during upcoming negotiations for RA capacity. That omission relates to when a resource must be excluded from an LSE's RA report based on either a planned outage in the upcoming report-month or a forced outage that is reasonably anticipated to extend into the report-month. As previously included in the CAISO's response to the Workshop Report, the CAISO recommend that a resource must be replaced by the LSE (or LSEs) and reflected in the RA report when the resource is expecting a maintenance need that is greater than one fourth of the month.

G. Commission Should Not Permit a Grace Period for New Firm LD Contracts

Several parties object to the Draft Decision's rejection of a "grace period" in which LSEs could enter into new Firm LD contracts and its imposition of portfolio share limitations. The CAISO strongly asserts that no grace period should be permitted. Given the Draft Decision's adoption of a capacity-based RA obligation, it is critical that coherent progress be made toward that vision. However, to the extent limited, short-term adjustments to other elements of the limitation on Firm LDs are warranted to effectuate an appropriate balance of equities, the CAISO believes it is appropriate for the Commission to do so.

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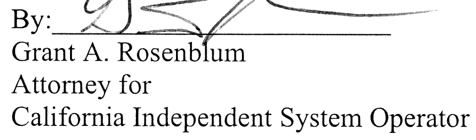
Conclusion

For the foregoing reasons, the CAISO respectfully requests that the Commission adopt a final decision that incorporates the foregoing recommendations.

October 24, 2005

Respectfully Submitted:



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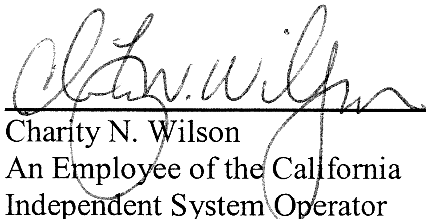
CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic and United States mail, Reply Comments of The California Independent System Operator Corporation on the Draft Decision of ALJ Wetzell Regarding Opinion on Resource Adequacy Requirements in Docket No. R.04-04-003.

Executed on October 24, 2005, at Folsom, California.



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