

**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 Market Design Protocols

Rulemaking 07-01-041
(January 25, 2007)

**COMMENTS OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
TO THE PROPOSED DECISION ADOPTING PROTOCOLS FOR ESTIMATING
DEMAND RESPONSE LOAD IMPACTS**

The California Independent System Operator Corporation (“CAISO”) submits its comments to the Proposed Decision (alternatively, “PD”) of ALJ Hecht Adopting Protocols for Estimating Demand Response Load Impacts, issued on March 25, 2008 in this proceeding.

Introduction

The Proposed Decision adopts protocols for estimating the impact of demand response (DR) activities on electric load; these protocols are set forth in Attachment A to the PD. The PD states that the protocols shall be used by the three Investor Owned Utilities in the preparation and evaluation of their 2009-2011 DR Program and Budget Applications, which are due to be filed on June 1, 2008.

The PD addresses treatment of load impact issues for Phase 1 of the rulemaking. The further issues for treatment in the rulemaking include cost effectiveness methodologies in Phase 1 and the development of DR goals in Phase 2.

The CAISO Supports the Development of an Operational Load Impact Protocol

The CAISO is pleased that the PD includes a provision signaling that the Commission endorses the development of operational load impact protocols for use in CAISO operational planning and scheduling in CAISO wholesale markets. In this regard, the PD provides, in Section 6, as follows:

6. Load Impact Protocol for Operational Planning Purposes

In their comments on the staff report on load impact issues, CAISO requested a further phase of this proceeding or additional work to complete load impact protocols for operational resource planning for their own use in scheduling the wholesale market. The Commission sees the benefit of adapting load impact protocols that would be useful for operational resource planning. Work to develop modifications to load impact protocols for this purpose will be explored in a future phase of this proceeding or a successor proceeding (PD at p. 29.)

The CAISO believes that the application of operational load impact protocols by DR Providers will be beneficial, by bringing about consistency in the determination and communication of demand response resource quantities to the CAISO, for example, on a Day-ahead and Day-of basis and on a locational basis. The CAISO encourages the Commission to initiate the work outlined in Section 6 in a Phase III of the current proceeding, with the goal of developing operational load protocols for use by the summer of 2009. The CAISO believes that it possible for this effort to build upon the body of work and expertise that resulted in the current protocols developed to date. The CAISO looks forward to working with the Commission and parties to assist in developing this additional and important body of work.

Respectfully submitted,

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Dated: April 14, 2008

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2008. I served, by electronic mail and U.S. mail, a copy of the foregoing Comments of the California Independent System Operator to the Proposed Decision Adopting Protocols for Estimating Demand Response Load Impacts on the service list for proceeding R.07-01-041.

Executed on April 14, 2008 at Folsom,
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/s/ Anna Pascuzzo //

Anna Pascuzzo,
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