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

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| Order Instituting Rulemaking to Consider Refinements to and Further Development of the Commission's Resource Adequacy Requirements Program | ) ) ) ) ) | R.05-12-013 |

**POST-WORKSHOP REPLY COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION ON RESOURCE ADEQUACY PHASE 2, TRACK 1 PROPOSALS**

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Dated: April 20, 2007

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# POST-WORKSHOP REPLY COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION ON RESOURCE ADEQUACY PHASE 2, TRACK 1 PROPOSALS

In accordance with the procedural schedule set forth in the Assigned Commissioner's Ruling and Scoping Memo for Phase 2, dated December 22, 2006 ("ACR"), the California Independent System Operator Corporation ("CAISO"), respectfully submits its post-workshop reply comments on issues identified as "Track 1" in the above-captioned proceeding. The reply comments follow the outline contained in the Commission Staff's Workshop Report.

## I. The Commission Should Adopt the Zonal Proposal Developed by the Joint Parties

The CAISO's position on the topic of addressing zonal capacity needs is set forth in the Joint Parties'[1] reply comments on Path 26 RA Counting Proposal.

## II. Local Resource Adequacy Issues

### A. 2008 LCR Study

#### 1. The CAISO Properly and Consistently Applied the LCR Study Methodology to SCE's Service Territory

In its comments, SCE alleges that the "CAISO's 2008 LCR Study has inappropriately used outages of intertie transmission lines to define local needs in both

[1] Joint Parties are SCE, PG&E, SDG&E, TURN and the CAISO.

the Big Creek/Ventura area and the LA Basin Area. (SCE Comments at 3.) SCE asserts that as a result of this purported departure from the 2007 LCR Study, the amount of local generation required in SCE's service territory has significantly and improperly increased.[2] This allegation is incorrect. Equally important, SCE appears to also be confused regarding the effect a local area boundary, as opposed to a relevant, limiting contingency, on local capacity needs.

Contrary to the implication raised by SCE, the fundamental methodology underlying the 2008 LCR has not changed from the 2007 study. This reality is manifest from a comparison of page 18 of the 2008 LCR Study and page 15 of the 2007 LCR Study. Simply put, the potential universe of transmission line outages that may be considered for purposes of identifying the most severe contingency and the resulting LCR need for a particular local area has always encompassed any transmission line, including interties. Thus, the methodology underlying the CAISO's evaluation of the LA Basin was not enlarged or otherwise modified.

The CAISO in its April 3, 2007 update to the 2008 LCR Study explained that the increase in LCR in the LA Basin resulted from unavailability of results from a then-pending SCE study evaluating the effect on the South of Lugo operational path rating of transmission upgrades that were still under construction at the time of the 2007 LCR Study. The 2008 LCR study incorporates the outcome of the SCE study and therefore reflects the current, accurate South of Lugo operational path rating. Thus, as noted in the 2008 LCR Study, the increase in capacity needs in the LA Basin arises from differences between the manner in which the CAISO accounted for the unavailability and uncertainty of the study results in the 2007 LCR Study and the use of actual final results of the SCE study in the 2008 LCR Study.

At the time the 2007 LCR Study was performed, South of Lugo had a formal operational path rating of 5600 MW. However, the CAISO understood that the South of Lugo operational path rating would increase during the following year when CAISO-approved transmission upgrades were completed or finally implemented by SCE. The

[2] SCE questions whether the CAISO's March 21, 2007 stakeholder presentations transposed a number for the Big Creek/Ventura local area. The total LCR need for the Big Creek/Ventura is 3,658 MW as stated in both March 9 and April 3 LCR reports. The March 21, 2007 stakeholder meeting presentation was in error.

extent of the increase was unknown because the new South of Lugo operational path rating was under development by SCE. The new formal South of Lugo operational path rating is 6100 MW as a result of the completed upgrades.

Accordingly, at the time the 2007 LCR study was performed, the CAISO identified two potential means of addressing the uncertainty surrounding the South of Lugo operational path rating. The first option was to use the approved South of Lugo operational rating of 5600 MW. This option would have resulted in a 2007 LCR need driven by the loss of Devers-Valley 500 kV line with SONGS #3 unit out of service, while maintaining the 5600 MW South of Lugo operational path rating. Such an outcome would have been equal to last year's projected need plus the SONGS #3 units output and additional generation to keep the path bellow the 5600 MW limit (see footnote 24 in page 65 under the 2007 LCR Report) (e.g., 8843 + 1080 + 900 = 10823 MW). The second option ignored the existing 5600 MW operational path rating as obsolete and, instead, utilized the next worst contingency in the area based on the same criteria published in page 15 of the 2007 LCR report.

The CAISO selected the second option, which resulted in a 2007 LA Basin LCR need of 8843 MW, on the basis that the first option was unfair to LSEs and ratepayers because it did not to take advantage of the upgrades. Had the accurate data been used, the real need for 2007 should have been equal with last year's projected need plus the SONGS #3 units output (e.g., 8843 + 1080 = 9923 MW). Accordingly, the South of Lugo upgrades lowered the LCR needs by 900 MW (e.g., 10823 – 9923 = 900 MW), refuting SCE's assertion that the CAISO's 2008 LCR Study suggests that the South of Lugo upgrades were not beneficial. The change the actual need of 9923 MW in 2007 to 10130 in the 2008 LCR Study is driven by load increase in the LA Basin over the past year. Again, SCE's assertion of a "significant" increase in LCR for LA Basin is simply false.

Part of SCE's confusion is evident by its statement that the increase in LCR in the LA Basin is the result of a change in the LA Basin "boundary" between the 2007 and 2008 LCR Studies from the Devers-Valley 500 kV line to the Devers-Palo Verde 500 kV line. This boundary realignment was instituted for LA Basin at SCE request and after diligent coordination between CAISO planning and operations engineering with SCE planning and operations engineering. A change in boundary of a local area affects what load and which generators are considered in the local area. Here, the change reflects the inclusion of the Devers 500 kV bus. However, no load or generators are connected to that bus. Thus, the boundary change is wholly irrelevant to any LCR increase in 2008 because the same loads and generators were in the area before and after the realignment.

Similarly, SCE "questions" the appropriateness of the considering a Lugo-Victorville outage as part of the critical contingency defining the Big Creek/Ventura local area. The CAISO finds this claim disconcerting. As SCE acknowledges, SCE itself has done the same studies and used the same contingency (Lugo-Victorville 500 kV) in order to come up with their own LCR results for Big Creek/Ventura. However, SCE now attempts to discount this fact by claiming that its "2006 Transmission Expansion Plan was developed in an effort to mimic the methodology, the methodology, local area definitions, and dispatch that SCE believed the CAISO was intending to follow in its LCR Study." Candid communication and coordination is critical between the CAISO and the Participating Transmission Owners ("PTOs") in conducting the LCR Study. The time to question the use of the contingency was back in 2006 when it was "mimicking" the CAISO, not now at the eleventh hour.

SCE suggests that its concerns regarding the LA Basin warrant reverting back to the use of the RMR definitions for determining LCR in the LA Basin. (SCE Comments at 5.) The Commission should reject this suggestion. Using the RMR definition for LCR it is infeasible for the following two reasons:

1) RMR definitions are established yearly and change yearly. The LCR local area definitions are based on historical knowledge of the system and aligned with current operational practices. In order to accommodate longer-term procurement, the study inputs, methodology and assumptions clearly specify that local area the boundary should be fixed so that the same loads are responsible for, and same generators eligible to meet, the LCR needs in a particular area. Accordingly, for purposes of the LCR, the CAISO does not anticipate substantive changes to the local areas boundaries unless a major transmission or generation project becomes operational and alter existing local area constraints.

2) One major change from the RMR studies into the LCR studies it that all units needed to maintain local reliability are included in the need part. The stakeholders and CPUC in its RA program wanted the CAISO to tell LSE all local reliability needs of the system in order for them to achieved an informed procurement, so that at the end of the process the CAISO would not use its back-stop procurement role for issues not covered in this report because that would cause over procurement (since the LSE have already procured 115 %-117% of their peak capacity requirement). The old RMR studies considered that all units needed for 500 kV path mitigation (including South of Lugo) are provided to the CAISO through market, therefore they were considered on-line in those studies without being included in the need part. The old RMR definition does not provide the CAISO with enough capacity to mitigate the most stringent constraint that we face in real-time (South of Lugo path). PG&E and SDG&E have a lot of lower (60, 70, 115, 230 kV) related LCR needs as such by the time all the generation is added there is almost no need to mitigate 500 kV paths or contingencies. On the other hand the SCE system is constrained on the 500 kV system and not as much on the lower kV system. Still the CAISO needs to maintain local grid reliability regardless of voltage or constraint type.

Finally, the Commission has the authority to determine whether to require its jurisdictional LSEs to procure needed local capacity. In this regard, the CAISO notes that LSEs will have approximately the same time to procure local capacity in the Big Creek/Ventura local are as LSEs had last year in procuring to meet the new LCR requirements generally. Therefore, given that the CAISO believes the Big Creek/Ventura local area represents capacity needed to meet accepted reliability criteria, the CAISO believes that no waivers or phase in should be allowed and that the Commission's general waiver provisions are sufficient.

### 2) PG&E Does Not Raise Concerns Sufficient to Delay or Modify Adoption of the 2008 LCR Study

PG&E primarily seeks to improve the process leading to publication of the CAISO's LCR Studies. The CAISO shares PG&E's goal of conducting the LCR Study in a deliberate manner that is fully integrated into the CAISO's annual grid planning process. While progress has been made, including the widely approved establishment of LSAG, the CAISO recognizes that improvements must still be made. PG&E's concerns over the study process do not, however, warrant any delay in the Commission's adoption of the 2008 LCR Study results.

In this regard, PG&E provides a single example of an apparent lack of transparency in the 2008 LCR Report that relates to question whether the CAISO counts partial or whole generating units. The CAISO does not count whole units. Instead, the CAISO utilizes the actual generation output of the units in the area up to 100% loading on the most constrained element. If an area is driven by an G-1 or a G-1, L-1, then the most limiting generation outage is added as a whole unit to the actual generation output of all units in the area needed in order to maintain 100% loading on the most constrained element. Finally, the CAISO attaches its response to PG&E's comments to the CAISO on the 2008 LCR Study, dated March 29, 2007, to demonstrate that PG&E's technical concerns have been considered.

### 3) The Commission Should Reject Aglet's Proposed Revisions to the Local RAR Program

Aglet asserts that the CAISO's 2008 LCR Study suffers from three defects: (1) it fails to discuss probabilistic analysis, (2) it fails to address demand response, and (3) it fails to apply a 1-in-5 temperature demand forecast. (Aglet Comments at 2.) As ALJ Wetzell is well aware, the CAISO has complied with the Commission's directive to address on the record in this proceeding the potential application of a probabilistic analysis as well as the role of demand response in satisfying local capacity requirements. As such, Aglet's criticisms of the 2008 LCR Study in this regard are misplaced.

Aglet's request to adopt a 1-in-5 adverse weather demand forecast is also without merit and should be rejected. The propriety of the input assumptions underlying the 2008

LCR Study were fully vetted and agreed upon through the LCR Study Advisory Group ("LSAG"). No active member of LSAG disputes the use of the as applied 1-in-10 demand forecast assumption in the 2008 LCR Study.

Moreover, Aglet's calculation of relative cost effectiveness of utilizing the different demand forecasts is incomplete and inaccurate. First, Aglet errs by assuming the existence of a per MW reduction in LSE RA procurement for every MW reduction in the local capacity requirement. In reality, f if the local capacity numbers are reduced, the aggregate procurement by LSEs remains unchanged. The reason is that local capacity counts toward satisfaction of the overall system RA needs, i.e., 115-117% of 1-in-2 adverse temperature demand forecast. Thus, the cost effectiveness should be calculated based on the difference in price between purchasing RA capacity with local attributes compared to RA capacity without such attributes. Second, Aglet myopically compares costs only to the value of service assigned by residential customers – the customer class that least values reliable electric service. When other customer classes are considered, such as small and large businesses, PG&E's 2005 Value of Service Study clearly suggests the cost to customer of service interruptions greatly exceed the cost of producing the electricity.

**4) The Commission Should Reject AReM's Program Modifications**

AReM expresses concern that the RAR program is a "one-way street" that focuses on generation solutions and therefore imposes on LSEs - but not the transmission owners responsible for the constraints - the burden of satisfying increases LCR obligations. AReM's criticism ignores the overall regulatory landscape. In Order 890 (February 16, 2007), FERC recently mandated all transmission providers adopt a planning process that explicitly seeks to identify and promote cost-effective transmission solutions to congestion and other operational requirements. Even prior to issuance of Order 890, the CAISO embarked on an effort to implement a more proactive transmission planning process that seeks to improve reliability and the economic efficiency of system operation. The CAISO's "2007 Transmission Plan" represents the initial outcome of its still evolving effort.[3] The CAISO, therefore, recognizes that it must coordinate with the Commission to integrate transmission planning and LSE procurement requirements into

[3] See, Annual Transmission Planning, http://www.caiso.com/thegrid/planning/index.html.

their respective processes in a manner that rationally allocates responsibility for grid reliability and eliminates any "one-way street."

The CAISO further agrees with AReM that PTOs should cooperate with the CAISO, as part of its transmission planning process, to identify and implement any valid operating procedures that may reduce the LCR in their service territories. In this regard, the CAISO reiterates the request made in its opening comments that a supplemental review process be authorized to permit further CAISO evaluation of potential operating solutions that may yet be identified to reduce the LCR for 2008.

The CAISO, however, urges the ALJ to reject certain arbitrary program modifications proposed by AReM. One such proposal is the imposition of an arbitrary 10% limit on LCR increase per utility per year. Nowhere does AReM demonstrate that its proposed limit will enable compliance with the reliability target. Generally, where no new transmission or generation additions occur during a particular year, the LCR need will grow with the load growth, which is approximately 2-3% annually. By definition, some areas and subpockets will grow much faster than the average in the range of 6% per year. The growth capacity requirements resulting from this load growth are not linear because the need may be driven by voltage or reactive margin problems. As such, it may be possible that certain local capacity needs will exceed 10% annual growth even under normal conditions and that other solutions, such as operating solutions or transmission, cannot be implemented in a feasible and timely manner.

The CAISO agrees with AReM, Sempra Global, SDG&E, DRA, and others that the real solution to this problem is well-understood and accepted LCR study methodology, including using a probabilistic analysis, that lead to predictable outcomes. In this regard, the CAISO emphasizes that the addition of the Big Creek/Ventura local area was not the product of changes in the methodology, but rather the result of greater experience with the newly developed LCR Study analysis. Accordingly, the CAISO considers this year's increase an aberration that is unlikely, if never, to be recurring.

A second AReM proposal that should be rejected by the Commission is the suggested imposition of a rigid threshold that would trigger mandatory CAISO procurement and a concomitant LSE exemption from LCR obligations. The proposal clearly conflicts with the Commission's policy preference to minimize CAISO procurement and assign primary responsibility to LSEs to secure resources necessary to reliably serve their load. Moreover, while market power concerns should be vigilantly monitored and addressed, an overly-broad prophylactic approach is unnecessary given the absence of any proof that market power has prevented, or will prevent, LSE compliance with their LCR obligations.

**5) CMUA's Claim that the LSAG Did Not Consider the Methodology Underlying the 2008 LCR Study is Incorrect**

CMUA states that "[u]nfortunately, by the time the LCR Study Advisory Group ("LSAG") began work in earnest, it was considered already too late to review changes to the methodology in time for the 2008 Resource Adequacy cycle." (CMUA Comments at 2.) This is incorrect. The CAISO, in the LSAG, consistently stated as its goal the review of the methodology and assumptions underlying the 2007 LCR methodology for adoption in 2008. In fact, LSAG reviewed the methodology and assumptions used in the 2007 studies and, based on that review and input from LSAG members, the CAISO conducted the 2008 LCR Study without fundamental alterations. In contrast, what there admittedly was insufficient time for was to validate or implement a whole new methodology or the use of a different software package. However, the LSAG group or its success will continue to evaluate any proposed new methodologies on their own technical merit going forward.

**6) Response to IEP's Request to Document Discrepancy in SDG&E Demand Forecast**

SDG&E has informed the CAISO that: "Please note that SDG&E is using a 90/10 and 80/20 load forecast that originates from the CEC June 2006 staff update as requested by the CAISO, but is different from the CEC forecast due to the use a different ratio than the CEC to calculate the 90/10 and 80/20 forecast. Please also note that SDG&E's forecast and ratio is the same as what is used in the Sunrise Powerlink filing and SDG&E's Long Term Procurement Plan filing. "The exact reason for this departure from CEC method is described in CEC docket 05-SDO-1. Attached is the document that was filed with the CEC that describes SDG&E's justification for using SDG&E's load forecast.

### B. The CAISO Opposes the Adoption of Seasonal LCR Obligations As Part of Track 1

The CAISO submits that no party has refuted the concerns expressed in the CAISO's opening comments against adoption of a seasonal LCR. Accordingly, the CAISO requests that the Commission reject further consideration of a seasonal LCR as part of Track 1.

### C. No Further Aggregation of Local Areas is Necessary or Desirable

The CAISO does not support the aggregation of the LCR for SCE's service territory as suggested by certain parties. The causes and system configuration that justify an interim application of aggregation in PG&E's service territory are not analogous to SCE.

Aggregation was employed in the relatively small and often resource deficient local areas in PG&E's service territory to primarily address market power concerns. However, the two local areas identified in SCE's service territory - LA Basin and Big Creek/Ventura ("BCV") – do not implicate the same concern.

Reviewing the CAISO's 2008 LCR Study, the combined Category C local capacity need of the LA Basin and BCV is 13,788 MW. Subtracting the contribution from municipal and QF resources in each local area yields an aggregate LCR of 8,780 MW for these two areas. The LA Basin alone has 8,545 MW of Market MWs as reported in the LCR Study. This equates to 97% of the combined LCR for LA Basin and BCV. As a result, if aggregation was permitted, LSEs could satisfy virtually all the combined obligation through local capacity located solely in the LA Basin. The CAISO is, therefore, concerned that aggregation in SCE's service territory will lead to under-procurement of the "right" MWs to meet the actual needs of both local areas. Such an outcome would likely compel use of the CAISO's backstop procurement at added cost to LSEs. The CAISO urges the Commission to oppose any further aggregation of local areas.

## III. The Commission Should Clarify its RA Policy on Demand Response

The CAISO agrees with many of the commenting parties that the majority of the demand response ("DR") issues should be vetted through the DR OIR; however, the policy pertaining to the counting of reliability-based DR resources for local and/or system RA purposes should be clarified in the Track 1 decision in June and not deferred to another proceeding or to the DR OIR.

The CAISO position continues to be that Stage 2 & 3[4] emergency-triggered DR programs have value with respect to their narrowly defined role and intended purpose. However, such programs should not "count" as RA capacity given the dispatch trigger is inconsistent with the Commission's stated RA objectives. By allowing Stage 2 & 3 triggered DR resources to count towards RA capacity, the Commission is, de facto, permitting resource adequacy resources to become available to the grid only after the CAISO has dispatched all other available RA and non-RA resources and is already or expecting to violate WECC/NERC operating requirements to avoid involuntary load shedding. Further, to the extent the eligibility of such DR resources as RA capacity, when coupled with the use of a 1-in-2 adverse temperature demand forecast, compels the CAISO to dispatch non-RA resources to routinely serve load, there will be a cost consequence that may offset the purported economic justification for counting these resources in the first instance.

Accordingly, in its scheduled June decision, the Commission should determine that emergency-triggered DR resources should not count as RA capacity and, importantly, outline the practical realities and steps necessary to achieve its stated policy for these programs. As such, CAISO submits that Commission's policy should consider a transition phase or phase-out period, a deferral of certain technical and programmatic issues to the DR OIR proceeding, and/or consideration of emergency-triggered DR programs as a Track 3 issue. Such a decision would obviate the need for a wholesale change in Commission policy regarding emergency-triggered DR programs and allow for a pragmatic approach to implementing the policy directive. Thus, the CAISO urges that, at a minimum, the Commission should articulate that its going forward policy will be to

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[4] For an explanation or additional information of the Stages of Electrical Emergencies, please refer to the document found at http://www.caiso.com/docs/2005/08/03/2005080315474812227.pdf.

work toward the exclusion of the currently structured emergency-based DR programs from the RA program, and that it will continue to pursue efforts to ensure DR program characteristics align with RA program objectives. In this regard, as a general principle, the Commission should emphasize the development of non-emergency initiated, price-responsive DR programs that integrate with the Day-ahead and/or real-time wholesale electricity markets and timelines. Likewise, the Commission should bring to a close the development and approval of additional emergency-only DR products, particularly if such DR programs are given consideration as resource adequacy capacity.

The CAISO's understanding is that the existing Commission tariffs covering interruptible DR programs are written broadly enough so that these reliability-based programs could be triggered possibly sooner than a declared emergency, i.e., an CAISO issued alert or warning, vs. Stage 2 or 3, even though these programs may have been only dispatched at Stage 2 or 3 historically or in practice. Therefore, to ameliorate concerns regarding the counting of the existing suite of reliability-based DR programs, the CAISO recommends counting existing reliability-based DR programs for meeting local and system RAR, provided these DR resources can transition to be:

- Triggered sooner than an emergency, i.e., at an CAISO issued alert or warning vs. Stage 2 or 3
    - However, after the transition any residual reliability-based DR capacity that is initiated through an CAISO declared emergency would not count for RA; and
    - Any new reliability-based programs would avoid explicit emergency initiation, Stage 1, 2 or 3 and, instead, focus on market-based bidding/pricing structures as the trigger, include limits in terms of maximum dispatchable hours, and reasonable notification periods.
- Identified within a local area as defined by the CAISO's LCR Study
- Dispatched for a declared transmission emergency
- Counted only in the months the programs are dispatchable, i.e. recognizing some programs are only available and dispatchable in the summer months.

With these recommended changes, parties are likely concerned that the CAISO would rely excessively on reliability-based programs should the Commission adopt this policy and appropriate transitional steps. However, the CASIO includes the following table to clarify that, based on historical evidence, there would not be excessive reliance on these programs nor would the CAISO likely exceed the number of events or hours eligible for dispatch under these programs.

**Historic Cumulative Totals of CASIO Declared Alerts, Warnings & Emergencies***

| | 1998 | 1999 | 2002 | 2003 | 2004 | 2005 | 2006 | 2007** | Average |
|---|---|---|---|---|---|---|---|---|---|
| **Alert** | 7 | 2 | 3 | 0 | 1 | 0 | 1 | 0 | 1.8 |
| **Warning** | 8 | 6 | 4 | 0 | 2 | 2 | 5 | 0 | 3.4 |
| **Stage 1 Emergency** | 7 | 4 | 2 | 1 | 1 | 1 | 3 | 0 | 2.4 |
| **Stage 2 Emergency** | 5 | 1 | 1 | 0 | 0 | 2 | 1 | 0 | 1.3 |
| **Stage 3 Emergency** | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.0 |

** Anamolous data from energy crisis period of 2000 - 2001 excluded*
***To date*

*Source: CAISO website: http://www.caiso.com/docs/09003a6080/08/8a/09003a6080088aa7.xls*

The benefit of this approach is that DR resources that can be initiated without an emergency declaration. This helps the CAISO satisfy established WECC/NERC minimum operating reserve requirements, without incurring the costs associated with, for example, CAISO use of non-RA resources. In addition, a phase-out approach is consistent with previous Commission decisions such as the phase-out of LD contracts.

In summary, the CAISO is appreciative of the safety net the reliability-based programs have provided to all customers and is mindful of the effort required to transition these established programs. However, the Commission has an opportunity to clarify its policy, and is urged to do so, on transitioning away from the counting of emergency-triggered DR resources to meet local and system RA requirements, and importantly, pave the way for the future state of DR which should be tightly integrated with the wholesale electricity markets and contribute to the reliable operation of the grid.

## IV. The CAISO Will Cooperate in Any Commission Decision to Modify the Compliance Year

Several parties support shifting the RA compliance year to May through April from the current calendar year as a means of incorporating the experience of the most recent summer into the coming year's RA requirements. The CAISO similarly supports examining the feasibility of this shift. However, such a shift is likely impractical for implementation in 2008. The CAISO emphasizes its continuing commitment to cooperate to ensure that CAISO process coordinate with determinations made by the Commission on its RA program.

## V. RA and RMR Coordination Option 8 Garnered Virtually Unanimous Support

Most parties, including the CAISO, support Option 8 of the Workshop Report for addressing the coordination of RA and the CAISO's backstop procurement function going forward. The CAISO recognizes the message underlying this selection – a replacement for the current Reliability Capacity Services Tariff ("RCST") is essential. The CAISO is committed to the extension of its RCST-type authority.

However, as TURN observed, some uncertainty exists whether the Federal Energy Regulatory Commission will approve such a mechanism in time for implementation in the 2008 RA compliance year. It is precisely because of this uncertainty that the CAISO will be pursuing alignment of the LCR and Reliability Must-Run ("RMR") criteria as a means of facilitating the use of its RMR authority to comply with local reliability requirements. Current RMR cost allocation rules do create the possibility of spreading these CAISO "backstop" costs other than to those LSEs that triggered the capacity deficiency. For this reason, TURN advocated pursuing Option 8 in the first instance, and developing an Option 7 transfer payment as a secondary alternative. The CAISO agrees that TURN's proposal to utilize the average RMR cost in each utility's service territory as the basis for the transfer payment constitutes a potentially elegant solution. The Commission should, therefore, assess the viability of this option from the standpoint of its own authority and regulatory processes.

## VI. The Commission Staff's Proposal on Counting Wind Resources Be Augmented After Additional Analysis of the Performance of Wind Resources on Peak

In addressing qualifying capacity for wind resources, PG&E commented that "the 2006 RA Report highlighted that wind produced less during the peak than their current qualifying capacity."[5] The CAISO agrees with this assessment and the conclusion drawn in the Commission's 2006 RA Report that "wind units provided significantly less actual generation at peak than the NQC value established by the counting conventions."[6] Given the marginal performance of wind resources over the peak period in Summer 2006, the Commission should seriously consider reviewing the qualifying capacity counting rules for wind resources so that the peak period performance of wind resources more closely align with RA counting conventions. With the CAISO's assistance, the Commission should analyze how the variants over which wind performance is evaluated, such as hours and/or months, is causing a misalignment between performance and the counting convention. However, in the interim, the Commission staff proposal is an acceptable enhancement to the current counting protocols.

## VII. The Commission Should Support Calpine's Efforts to Advance the Development of a Standardized Capacity Product

In its April 6, 2007 comments, the CAISO acknowledged the value of the progress made by Calpine and other parties in developing standardized capacity product to facilitate the creation of a more liquid market for capacity. Calpine provided additional evidence of its commitment to this effort by providing draft changes to the CAISO's MRTU Tariff to further the proposal's key feature - making RA capacity suppliers responsible directed to the CAISO, through explicit requirements in the CAISO Tariff. The CAISO reiterates its support for Calpine's effort and the need for a separate effort outside the Track 1 process to evaluate a possible procedural schedule and structure to review the obligations and requirements to support a standard capacity product, including potential changes to the CAISO Tariff.

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[5] See *Pacific Gas and Electric Company (U 39 E) Resource Adequacy Phase 2-Track 1 Comments*, April 6, 2007, Footnote 22, p. 21.

[6] See CPUC's *2006 Resource Adequacy Report*, February 2, 2007, p. 33.

## VIII. Conclusion

The CAISO respectfully requests that the assigned Administrative Law Judge prepare a draft decision on Track 1 issues consistent with the comments set forth herein and in the CAISO's opening comments, dated April 6, 2007.

Respectfully submitted,

***/s/Grant A. Rosenblum***
Grant A. Rosenblum

Attorney for
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CERTIFICATE OF SERVICE

I hereby certify that on April 20, 2007 I served, by electronic mail and United States Mail, a copy of Post-Workshop Reply Comments Of The California Independent System Operator Corporation On Resource Adequacy Phase 2, Track 1 Proposals on all parties in Docket Number R. 05-12-013.

DATED at Folsom, California on April 20, 2007.

***/s/ Susan L. Montana***

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