

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

Order Instituting Rulemaking to Oversee
the Resource Adequacy Program,
Consider Program Refinements, and
Establish Forward Resource Adequacy
Procurement Obligations.

Rulemaking 19-11-009
(Filed November 7, 2019)

**REPLY COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION ON
FINAL 2022 LOCAL CAPACITY TECHNICAL STUDY**

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Dated: May 11, 2021

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I. Introduction

Pursuant to the Assigned Commissioner's Amended Track 3B and Track 4 Scoping Memo and Ruling issued on December 11, 2020, the California Independent System Operator Corporation (CAISO) hereby replies to party comments on the Final 2022 Local Capacity Technical Study.

II. Discussion

The CAISO reiterates its request for stakeholders to engage in the CAISO Local Capacity Technical Study process establishing local capacity requirements (LCRs). The CAISO's process provides opportunities for stakeholders to comment on and better understand the LCR study process. Although the Commission provides parties an opportunity to file comments on the LCR results in this proceeding, the CAISO does not have an opportunity to respond to these comments in the final LCR report. Several parties filed comments on the final LCR in this proceeding, but did not provide comments in the CAISO's stakeholder process. In the future, the CAISO encourages parties to file any comments on the draft LCR results in the CAISO stakeholder process to ensure the CAISO has adequate opportunity to fully review and respond to the comments.

The CAISO disagrees with the California Community Choice Association's proposal to reject the LCR for the Greater Bay Area. The CAISO notes the 2022 LCR increase is largely due to the increase in load forecast for the San Jose sub-area, which is within the

Greater Bay Area.¹ Consequently, the CAISO recommends the Commission adopt the Greater Bay Area LCR to secure the capacity necessary to meet the increasing load forecast.

III. Conclusion

The CAISO appreciates this opportunity to provide reply comments on the Final 2022 Local Capacity Technical Study.

Respectfully submitted,

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¹ See CAISO 2022 Local Capacity Technical Study, p. 79 (“Compared to 2021 load forecast went down by 34 MW and total LCR need went up by 878 MW mainly due to load growth seen in the San Jose area (SVP) and it being very effective on the Metcalf 500/230 kV transformer banks. With all San Jose resources previously being used, the increased need had to be picked up by bigger amounts of less effective resources in other parts of the Bay Area.”)