

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Rancho Cucamonga Municipal Utility) Docket No. ER15-2550-000

**CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION'S
INTERVENTION AND COMMENTS ON WAIVER REQUEST**

The California Independent System Operator Corporation (CAISO) files this motion to intervene and comments in response to the request submitted on August 27, 2015, by Rancho Cucamonga Municipal Utility (RCMU) to waive resource adequacy plan reporting penalties called for under the CAISO tariff that otherwise would apply to RCMU. RCMU asserts that it meets the Commission's rules for granting tariff waiver requests. The CAISO takes no position on the question of whether RCMU meets the Commission's waiver standards. Instead, the CAISO offers these comments on several issues raised in RCMU's filing.

I. MOTION TO INTERVENE

The CAISO is a non-profit public benefit corporation organized under the laws of the State of California. The CAISO's Commission-approved tariff includes provisions regarding the timelines for scheduling coordinators representing load-serving entities to submit monthly resource adequacy plans. The CAISO tariff additionally contains penalty provisions for scheduling coordinators that do not meet these timelines. Because the CAISO has an interest in this proceeding that cannot be represented adequately by any other

party, the CAISO requests that the Commission permit it to intervene in this proceeding.

II. BACKGROUND ON RESOURCE ADEQUACY PLAN REPORTING

The resource adequacy program is a critical element to meeting grid reliability within the CAISO footprint. The CAISO administers the program in conjunction with the California Public Utilities Commission and other local regulatory authorities within the CAISO footprint. As part of the program, scheduling coordinators representing load-serving entities must submit monthly resource adequacy plans to the CAISO.¹ The monthly plans, which are due to the CAISO 45 days before the start of the month to which they apply, indicate which resources the load serving entity will rely on to satisfy its resource adequacy requirements.

The CAISO tariff has a general penalty provision that imposes a \$500 penalty for each day that “information that is required to be submitted to the CAISO under the CAISO Tariff” is late.² This penalty provision applies to late resource adequacy plans.

III. COMMENTS

The processes and procedures underlying the resource adequacy program are an important element of that program. Without timely reports from load serving entities the CAISO cannot know whether the load serving entities

¹ CAISO tariff section 40.2.2.4. Scheduling coordinators representing load-serving entities also must submit annual resource adequacy plans.

² CAISO tariff section 37.6.1.

within its footprint have secured sufficient capacity with adequate notice to take corrective action, such as issuing a capacity procurement mechanism designation under section 43 of the CAISO tariff, in the event that there are deficiencies. The CAISO thus believes it is important that all parties meet their resource adequacy reporting obligations. Further, in this case the CAISO is confident that it applied its tariff correctly and that, per the relevant tariff provisions, RCMU faced the appropriate sanctions.

In its filing, as it also did during the CAISO penalty enforcement process, RCMU asserts that it submitted the plan in question and that some form of server error prevented the CAISO from processing the plan. While the CAISO takes no position on the final question of whether RCMU merits a tariff waiver, the CAISO clarifies the information participants should have received with regard to status of successful uploads and the process participants can follow to verify whether or not their plans were loaded successfully.

To ensure market participants upload their plans successfully, the CAISO has provided market participants with training, market simulation opportunities, and user documentation for the California ISO Interface for Resource Adequacy (CIRA) portal, *i.e.*, the system used to load resource adequacy plans, and client service representatives are also available to help them navigate these issues. CIRA is designed to issue an error notice when the supply plans are not successfully loaded. The primary user documentation informs market

participants of the eleven separate error messages they may encounter.³ The documentation also provides direction regarding how they can verify if their resource adequacy plan was loaded successfully.⁴ Further, market participants can contact the CAISO through the general resource adequacy e-mail address or their client service representative to confirm their plans are successfully loaded.

Also relevant to the Commission's consideration of the issues referenced by RCMU is that the second phase of the CAISO's reliability services initiative potentially will explore ways to ease the resource adequacy reporting burden for load serving entities, particularly small utilities that are reporting small amounts of capacity.⁵ Considering resource adequacy reporting rule changes in this venue will allow the CAISO and entities like RCMU, along with all other interested stakeholders, the opportunity to consider changes in reporting obligations in the context of more comprehensive resource adequacy rule changes. To the degree the Commission views RCMU's filing as raising the potential for prospective tariff changes, the CAISO believes it already has a venue to consider any appropriate amendments.

³ Market Participant User Guide Customer Interface for Resource Adequacy (CIRA) Monthly RA Process, § 3.1, *available at* <http://www.caiso.com/Documents/CIRAMonthlyResourceAdequacyUserGuide.pdf>.

⁴ *Id.* at § 2.4 ("If [sic] plan passes validation on upload the application will accept the plan and the status is set to validation in progress") and § 5.1 (providing screenshot of table in CIRA that provides status of submitted plans).

⁵ Information about this stakeholder process is available at: <http://www.caiso.com/informed/Pages/StakeholderProcesses/ReliabilityServices.aspx>.

IV. CONCLUSION

The CAISO takes no position on the issue of whether RCMU merits a tariff waiver in these circumstances but clarifies the process for submission and verification of supply plans to address issues referenced by RCMU in its request.

Respectfully submitted,

By: /s/ David S. Zlotlow

Roger E. Collanton

General Counsel

Anna A. McKenna

Assistant General Counsel

David S. Zlotlow

Senior Counsel

California Independent System

Operator Corporation

250 Outcropping Way

Folsom, CA 95630

Tel: (916) 351-4400

Fax: (916) 608-7222

dzlotlow@caiso.com

Counsel for the California Independent
System Operator Corporation

Date: September 17, 2015

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service lists in the above-referenced proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California this 17th day of September 2015.

Is/ Anna Pascuzzo
Anna Pascuzzo