

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

Order Instituting Rulemaking to Consider)	
Refinements to and Further Development of the)	R.05-12-013
Commission's Resource Adequacy)	
Requirements Program)	
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**JOINT REPLY COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION, PACIFIC GAS AND ELECTRIC COMPANY (U 339 E),
SAN DIEGO GAS AND ELECTRIC COMPANY (U 902 E), SOUTHERN CALIFORNIA
EDISON COMPANY (U 338 E), AND THE UTILITY REFORM NETWORK ON THE
PATH 26 RA COUNTING PROPOSAL**

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NETWORK ON THE PATH 26 RA COUNTING PROPOSAL**

Pursuant to the Assigned Commissioner’s Ruling and Scoping Memo for Phase 2, issued December 22, 2006 (“Scoping Memo”), the California Independent System Operator Corporation (“CAISO”), Pacific Gas and Electric Company (“PG&E”), San Diego Gas & Electric Company (“SDG&E”), Southern California Edison Company (“SCE”), and The Utility Reform Network (“TURN”) (collectively “Joint Parties”) submit the following reply comments in response to comments received by the Commission on the Joint Parties’ Path 26 RA Counting Proposal.¹

¹ *Joint Proposal of the California Independent System Operator Corporation, Pacific Gas and Electric Company, San Diego Gas and Electric Company, Southern California Edison Company and The Utility Reform Network to implement a Path 26 Counting Constraint in the CPUC’s Resource Adequacy Program, (“Path 26 RA Counting Proposal”), dated March 22, 3007.*

I. THE COMMISSION SHOULD ADOPT THE JOINT PARTIES' PATH 26 COUNTING CONSTRAINT PROPOSAL FOR THE 2008 RA PROGRAM CYCLE

The overwhelming majority of workshop participants recognize the need to impose a limit on the transfer capability across Path 26 as a necessary refinement to the Resource Adequacy (“RA”) program that should be implemented for the 2008 RA compliance year. The Path 26 RA Counting Proposal aligns the RA program with the Commission’s RA objective of having capacity when and where needed by addressing the CAISO’s identified need to ensure a sufficient distribution of capacity between current congestion zones.

Contrary to the sentiment expressed by a small number of parties, the explicit zonal requirement proposed by the Division of Ratepayer Advocates (“DRA”) is neither simple nor fair, and it is incomplete in that it fails to address important policy and implementation details captured in the Path 26 RA Counting Proposal. The DRA proposal is flawed in three important ways: (1) it fails to capture the efficiencies associated with counterflows on Path 26, resulting in a likely increase in the overall cost of RA procurement, (2) it socializes certain load-serving entity (“LSE”) - specific assets across all LSEs in a zone, and (3) it adds potential administrative complexity. For these and other reasons, as detailed in the Joint Parties’ post-workshop comments,² the Commission should reject DRA’s zonal requirement proposal and other calls to delay implementation of the Path 26 RA Counting Proposal.

² *Joint Post-workshop Comments of California Independent System Operator Corporation, Pacific Gas and Electric Company (U 339 E), San Diego Gas and Electric Company (U 902 E), Southern California Edison Company (U 338 E) and The Utility Reform Network on the Zonal RA Proposal of the Division of Ratepayer Advocates, April 6, 2007.*

II. SPECIFIC COMMENTS REQUIRE ADDITIONAL CLARIFICATION OR REFLECT A MISCHARACTERIZATION OF THE JOINT PARTIES' PROPOSAL

Certain parties' comments mischaracterize, or reflect a lack of understanding of, the Path 26 Counting Proposal. Accordingly, the Joint Parties clarify the following programmatic, operational and regulatory issues raised by the commenting parties:

A. Programmatic Issues

1. Don't complicate the RA program to solve a "potential" problem

Pilot Power Group expressed concern that "[i]t makes little sense to add complexity and cost to the RA program to fix a "potential" problem that has not been an actual problem."³ The Joint Parties are similarly sensitive to adding cost and complexity to the RA program. However, the Joint Parties submit that the value of the Path 26 RA Counting Proposal in promoting the objectives and sustainability of the RA program outweighs such countervailing concerns.

The limited transfer capability across Path 26 is not a "potential" problem, but a real "bottleneck" in the system that creates the need to ensure RA capacity is available and appropriately dispersed between NP26 and SP26 so that the load in each zone can be served reliably. If it does not address this constraint, the RA program would have a persistent gap that would increase the likelihood of the CAISO having to rely on non-RA capacity or on its backstop authority to balance the needs in the zone. The costs of such non-RA capacity or other CAISO procured backstop capacity would substantially, if not

³ See *Comments of Pilot Power Group, Inc. on Track One Issues in Phase Two of the Resource Adequacy Proceeding*, April 6, 2007, p. 2.

entirely, offset the perceived cost advantages of the “do nothing” approach advocated by Pilot Power Group.

2. Grandfathering of existing contracts favors the IOUs and setting a date for “qualifying” contracts is inappropriate

Certain parties objected to “grandfathering” existing RA commitments. Under Step 2 of the Path 26 RA Counting Proposal, an LSE would be eligible to receive a “baseline” amount of Path 26 capability based on the higher of: (1) the LSE’s load-ratio share of load in the zone or (2) the sum of the LSE’s existing commitments, including Existing Transmission Contracts (“ETCs”), Transmission Ownership Rights (“TORs”), and specific RA resource contracts existing as of February 21, 2007.

The Path 26 RA approach is similar to the CAISO’s proposal for assigning transmission capacity over interties into the CAISO Control Area. For both import and Path 26 capability, the justification underlying grandfathering is the recognition that certain parties entered into long-term commitments prior to the advent of a path allocation requirement, and should not be penalized for engaging in procurement practices consistent with the intent of the Commission’s RAR program. Indeed, many parties recognized the validity of this rationale, but objected to the potential magnitude of the transfer capability above load-ratio share that might be allocated to those LSEs with grandfathered commitments. Here, the effect of grandfathering is inconsequential overall, and only becomes a factor because of the need to effectuate the Commission’s prior directive to honor Department of Water Resources (“DWR”) contracts for RA purposes.

There is only one ETC held by an LSE serving load *within* the CAISO control area that exists on Path 26 in the South to North direction in the amount of 52.5 MW. Other than that, based on an initial assessment of contracts held by the applicable Joint Parties, no other LSE would exceed its load share based on grandfathered contracts, but for the need to consider the DWR Sunrise contract assigned to SDG&E. Thus, only as a result of the need to comply with prior Commission RA requirements to honor DWR contracts will any Commission jurisdictional LSE receive a baseline allocation of Path 26 capability in excess of its load-ratio share and even that small exception may be eliminated once the effects of netting are taken into account.

3. ETC treatment in the import allocation process may result in “double-dipping” when considering how ETCs are treated on Path 26

The Joint Parties do not share the concern expressed by the comments of Constellation Energy Commodities Group et al., that “...entities may be ‘double-dipping’ with respect to how their ETCs are allowed to count for RAR- once for intertie allocation, and once via a Path 26 allocation.”⁴ Rather, the Joint Parties’ proposal intentionally does not establish a direct linkage between ETCs across an intertie and an ETC across Path 26. The Joint Parties’ Proposal only evaluates ETC rights that exist across Path 26 without regard to the location of the source, *i.e.*, a physical generator in SP26 or import into SP26. For example, if an LSE with load in NP26 has a 50 MW ETC import into SP26 and a corresponding 50 MW ETC transfer South to North across Path 26 to serve its load in NP26, the LSE would not be allowed to grandfather 100 MW (50 MW import + 50

⁴ See *Comments of Constellation Energy Commodities Group, Inc., Constellation New Energy, Inc., Reliant Energy, Inc., Mirant California, LLC, Mirant Delta, LLC, and Mirant Potrero, LLC on Resource Adequacy Requirements- Phase2/Track 1 Proposals*, April 6, 2007, p. 4 (“Constellation Group Comments”).

MW transfer) of ETC transfer capability across Path 26; only the 50 MW ETC across Path 26 would be considered in the Path 26 capacity allocation process. Accordingly, the Joint Parties' Proposal could not create any "double-counting" for ETCs.

B. Operational Issues

1. Netting counterflows on an annual basis does not reflect what happens in real-time

The Independent Energy Producers Association ("IEP") generally supports the Path 26 RA Counting Proposal. However, IEP expresses the following concern:

*"the netting of RA capacity on an annual basis may have no reflection in the real-time flows of electricity, and the discrepancy between the contractual and physical realms may continue to produce congestion on the constrained path and therefore require continued reliance on CAISO procurement...."*⁵

It is, of course, true that physical and contractual flows will differ. The Path 26 RA Counting Proposal recognizes this reality, yet enhances the CAISO's reliability tools in the real-time operational time frame. This is accomplished by ensuring sufficient available RA capacity exists on either side of the Path 26 constraint to meet operational requirements. Consistent with the RA-based must-offer requirement, the CAISO would be able to call upon the capacity on the respective sides of Path 26 to meet its reliability requirements, whether or not those resources have been scheduled to operate by the LSE that holds the RA contract.

More specifically, under the Market Redesign and Technology Upgrade ("MRTU"), the CAISO will rely on its full network model to enforce all constraints on

the system, including transfers across Path 26. By having RA capacity appropriately dispersed between NP26 and SP26, along with the RA must-offer obligation, the CAISO will have the best opportunity to reliably dispatch RA resources when and where they are needed. Conversely, the absence of an appropriate dispersion of capacity between the north and south would inhibit the CAISO's ability to establish an effective dispatch and manage real-time operating requirements.

IEP should also recognize that the netting element of the Joint Parties' proposal accomplishes the same result that could be accomplished through bilateral trades by LSEs, except that explicit netting adds far more efficiency. Therefore, the issue raised by IEP, which the Joint Parties do not believe raises any true reliability problem, relates to the fundamental structure of the RA program rather than the Path 26 Counting Proposal, and the adoption of the proposal would neither increase nor lessen IEP's concern.

In summary, it is not imperative that netting on an annual basis reflect precisely what happens in real-time, so long as RA capacity with a must-offer obligation is appropriately dispersed. Appropriate dispersion enables the CAISO's full network model and real-time market applications to, among other things, dispatch RA resources in a way that efficiently manages constraints on the system both in the day-ahead and in real-time.

2. The Joint Parties' proposal does not provide the magnitude of ETCs and loop flow

The Constellation Group Comments state that “[t]he joint parties have not provided sufficient information about Existing Transmission Contracts (“ETCs”) or loop

⁵ See *Comments of the Independent Energy Producers Association on Track 1 Issues*, April 6, 2007, p. 3.

flows on Path 26.”⁶ The Joint Parties clarify that the proposal included an explicit actual derated value for the transfer capability across Path 26 North to South and South to North. Accounting for the derate associated with ETCs and loop flow, the transfer capability is 3,430 MW (N to S) and 2,583 MW (S to N).⁷ Specifically, 250 MW has been reserved for loop flow North to South on Path 26. All other derates to the maximum transfer capability on Path 26 of 4,000 MW (N to S) and 3,000 (S to N) are an accommodation for ETCs that serve load *outside* the CAISO Control Area.

C. Regulatory Issues

1. Rely on cost-effective backstop to balance zonal needs

Certain commenting parties indicated that if the zonal capacity need was of limited duration or quantity, then perhaps the CAISO should rely on its “cost-effective” backstop procurement authority to balance this need. The Joint Parties’ proposal attempts to uphold the CPUC’s RA objective that “all load-serving entities (LSEs) should acquire the resources needed for their own forecasted load in order to eliminate free ridership and to *minimize CAISO procurement*.”⁸ Furthermore, the notion that CAISO backstop procurement will be “cost-effective” is speculative, given that the CAISO’s backstop procurement mechanism in the MRTU timeframe has yet to be determined. For these important reasons, the Commission should reject arguments that would leave procurement to the CAISO, especially for capacity needs or constraints, like Path 26, that are known and can be addressed through the RAR program.

⁶ See *Constellation Group Comments* at p. 3.

2. The Joint Parties' proposal would require a FERC filing

If the CAISO and its stakeholders desire to apply *any* proposal, including the DRA proposal or the Path 26 Counting Proposal, uniformly to all LSEs operating in the CAISO control area, then the CAISO would eventually need to incorporate the provisions of the proposal into its tariff. However, the Joint Parties agree that incorporating specific provisions of the Path 26 RA Counting Proposal into the CAISO Tariff is not in any way a precondition to adoption by the Commission for the 2008 RA program cycle.

III. CONCLUSION

The Joint Parties have addressed and clarified the concerns raised and misstatements made by commenting parties. The Joint Parties' Path 26 RA Counting Proposal is a straightforward and pragmatic approach that helps align the Commission's RA program objectives with the CAISO's operational needs. For the foregoing reasons, the Joint Parties urge the Commission to adopt the Path 26 RA Counting Proposal as originally filed as part of the RA program cycle for the 2008 compliance year.

Respectfully submitted,

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⁷ See *Path 26 Counting Proposal* at p. 3.

⁸ R.05-12-013, *Administrative Law Judge's Ruling on Track 2 Proposals*, p. 4 [emphasis added].

CERTIFICATE OF SERVICE

I hereby certify that on April 20, 2007 I served, by electronic mail and United States Mail, a copy of Joint Reply Comments Of The California Independent System Operator Corporation, Pacific Gas And Electric Company (U 339 E), San Diego Gas And Electric Company (U 902 E), Southern California Edison Company (U 338 E), And The Utility Reform Network On The Path 26 Ra Counting Proposal on all parties in Docket Number R. 05-12-013.

DATED at Folsom, California on April 20, 2007.

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