



April 3, 2006

Attn: Commission's Docket Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Docket # R.04-04-003 - Order Instituting Rulemaking to Promote Policy and
Program Coordination and Integration in Electric Utility Resource Planning

Dear Clerk:

Enclosed please find an original and five copies of the **Reply Comment of the California Independent System Operator Corporation to the Petition to Modify Decision 05-10-042 of Southern California Edison Company** in the above-referenced docket.

Please date stamp one copy and return to California ISO in the self-addressed stamped envelope provided.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Grant A. Rosenblum".

Grant A. Rosenblum
Regulatory Counsel

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

Order Instituting Rulemaking to Promote)	
Policy and Program Coordination and)	R.04-04-003
Integration in Electric Utility Resource)	
Planning)	
_____)	

**REPLY OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
TO THE PETITION TO MODIFY DECISION 05-10-042 OF
SOUTHERN CALIFORNIA EDISON COMPANY**

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Attorneys for the
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Dated: April 3, 2006

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SOUTHERN CALIFORNIA EDISON COMPANY**

Pursuant to the Administrative Law Judge’s ruling, dated March 28, 2006, granting Southern California Edison Company’s (“SCE”) request that SCE and other parties be permitted to file reply briefs, the California Independent System Operator Corporation (“CAISO”) respectfully replies to the SCE’s Petition to Modify Decision (“D.”) 05-10-042 (“Petition”). The CAISO’s reply provides further clarification to support the continued application of the must-offer protocols adopted in D.04-10-035 to imports following implementation of the CAISO’s Market Redesign and Technology Upgrade Project (“MRTU”).

**After Implementation of MRTU, Imports Supporting Resource Adequacy
Contracts Can Mitigate the Risks Associated with the Offer Obligation**

At the workshop held on March 27, 2006, to discuss the development of a standard, tradable capacity product, several parties expressed some confusion as to the offer obligation on import resources that provide Resource Adequacy Capacity following implementation of the CAISO’s MRTU Tariff.¹ Specifically, some parties assumed that the offer obligation necessarily extended into real-time. This is inaccurate. The provisions do not necessarily require each System Resource² that sells Resource Adequacy Capacity to be available or bid through and into

¹ *California Independent System Operator Corporation*, FERC Docket No. ER06-615-000 (Feb 9, 2006).

² “System Resource” is “a group of resources, single resource, or a portion of a resource located outside of the CAISO Control Area, or an allocated portion of a Control Area’s portfolio of generating resources that are either a static interchange schedule or directly responsive to that Control Area’s Automatic Generation Control (AGC)

the real-time market. The real-time obligation will generally depend on the outcome of the CAISO's Integrated Forward Market ("IFM") and Residual Unit Commitment ("RUC") process.

A copy of the relevant Tariff provisions is attached. Section 40.6.1 requires Resource Adequacy Resources, including System Resources, to self-schedule or bid their Resource Adequacy Capacity into the IFM and RUC to the extent they are physically capable of operating. Section 40.6.2 imposes a real-time availability obligation only on those Resource Adequacy Resources that have been committed by the CAISO in by the IFM or RUC or have been committed through a self-schedule. Accordingly, that section imposes an obligation only on the uncommitted capacity of a Resource Adequacy Resource that was already committed in the day-ahead time frame. Finally, Section 40.6.5 clarifies that System Resources selling Resource Adequacy Capacity cannot be "all or nothing." In other words, a System Resource must be available for hourly commitment in RUC. For example, if the CAISO commits the resource in RUC for four (4) hours the following day, the resource cannot decline the commitment on the basis that it is a sixteen (16) hour peak contractual product. Thus, while the System Resource must be available for all hours of its RUC Commitment Period, that period will be known in the Day-Ahead.

"Short Start Units" must be available in real-time regardless of their commitment in the IFM or RUC pursuant to Section 40.6.3. Short Start Units have a cycle time of less than five hours, have a start-up time less than two hours, and can be fully optimized. The CAISO may waive the Short Start Unit availability requirement for those not self-scheduled or committed through the IFM or RUC based on a procedure to be published by the CAISO.

With the foregoing provisions as context, it is necessary to apply the rules to the different types of imports System Resources. There are four types of imports or System Resources: Dynamic Resource-Specific System Resources, Dynamic System Resources, Non-Dynamic

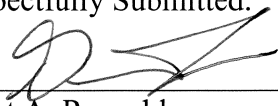
capable of providing Energy and/or Ancillary Services to the CAISO Control Area, provided that if the System

Resource-Specific System Resources and Non- Dynamic System Resources. For Resource Adequacy availability purposes, Dynamic Resource-Specific System Resources, Dynamic System Resources and Non-Dynamic Resource-Specific Resources will be treated by the CAISO like a resource internal to the CAISO. It is contemplated that a Non-Dynamic Resource-Specific System Resource is a specific physical unit outside the CAISO Control Area. What this means is that such System Resources will be able to submit non-zero Start-Up and Minimum Load bids and other operating criteria into the CAISO's Master File, such as start-up time and minimum run times. (See, e.g., Section 30.5.2.4.) This, in turn, allows such System Resources to avoid or mitigate many of the delivery and price risks, identified by FPL in its comments, that purportedly face an import that has not been prescheduled in the day-ahead market and is supported by a gas-fired resource. However, it also means that a Non-Dynamic Resource-Specific System Resource may be subject to the obligations of a Short-Start Unit depending on its physical characteristics.

Non-Dynamic System Resources are not permitted to submit non-zero Start-Up and Minimum Load bids into the IFM. Therefore, as a practical matter, to the extent the CAISO must commit additional resources or rely on available capacity in the RUC process, such System Resources will likely be selected. This selection will, pursuant to Section 40.6.2, require that the System Resource remain available to the CAISO through real-time. This obligation, however, is appropriate for a Non-Dynamic System Resource given that its definition as a group of resources or an allocation of another Control Area's portfolio. System Resources are presumed to be flexible and not face risks associated with forced outages and intra-day market volatility.

April 3, 2006

Respectfully Submitted:

By: 
Grant A. Rosenblum
Attorney for
California Independent System Operator

ATTACHMENT A

Interval LAP prices for the hour in the amount of the shortfall. Energy scheduled in the HASP will not net against, or be used as a credit to correct, any failure to fulfill the Day-Ahead IFM hourly scheduling and RUC obligation in Section 40.5.3.

(3) Any Energy surcharge received by the CAISO pursuant to Section 40.5.5, shall be allocated to Scheduling Coordinators representing other Load Serving Entities in proportion to metered Demand during the relevant Trading Hour(s).

40.5.6 Substitution of Resources.

Subject to the provisions of this Section 40.5, the Scheduling Coordinator for a Modified Reserve Sharing LSE may substitute for its Resource Adequacy Resources listed in its monthly Resource Adequacy Plan provided:

- 1) Substitutions must occur no later than the close of the IFM; and
- 2) Resources eligible for substitution are either imports or capacity from Non-Resource Adequacy Resources or Resource Adequacy Resources with additional available capacity defined as Net Qualifying Capacity in excess of previously sold Resource Adequacy Capacity; however the Local Capacity Area Resource may be substituted only with capacity from Non-Resource Adequacy Resources located in the same Local Capacity Area.

40.6 Requirements Applicable to Scheduling Coordinators for Reserve Sharing LSEs and Resources Providing Resource Adequacy Capacity to Reserve Sharing LSEs.

This Section 40.6 does not apply to Resource Adequacy Resources of Load-following MSSs and those entities that participate in the Modified Reserve Sharing program in Section 40.5. Scheduling Coordinators supplying Resource Adequacy Capacity shall make the Resource Adequacy Capacity listed in the Scheduling Coordinator's monthly Supply Plans under Section 40.4.7 available to the CAISO each hour of each day of the report-month in accordance with this Section 40.6.

40.6.1 Day-Ahead Availability.

Scheduling Coordinators supplying Resource Adequacy Capacity shall make the Resource Adequacy Capacity, except for that subject to Section 40.6.4, available Day-Ahead to the CAISO as follows:

(1) Resource Adequacy Resources physically capable of operating must Self-Schedule or submit Economic Bids or Self-Schedules for their Resource Adequacy Capacity into the IFM and RUC.

(2) Any inter-temporal constraints such as Minimum Run times must not be more restrictive than those pre-specified in the Master File limitations or as otherwise required by this CAISO Tariff or by Good Utility Practice.

(3) Resource Adequacy Resources that do not submit Self-Schedules or Economic Bids reflecting all of their Resource Adequacy Capacity will be subject to the CAISO's optimization for the remainder of their Resource Adequacy Capacity Bids into the Day-Ahead Market. If the Resource Adequacy Resource submits a Bid for Ancillary Service(s), the Energy Bid associated with the Bid for Ancillary Services will be optimized by the CAISO.

(4) Resource Adequacy Resources must participate in the RUC to the extent that the resource has available Resource Adequacy Capacity that is not reflected in a Self-Scheduled is already committed to provide Energy or capacity in the IFM. Resource Adequacy Resources will be subject to RUC and will be optimized at a zero dollar RUC Availability Bid.

(5) Capacity from Resource Adequacy Resources selected in RUC will not be eligible to receive a RUC Availability Payment.

40.6.2 Real-Time Availability.

Resource Adequacy Resources that have been committed by the CAISO in the Day-Ahead Market or the RUC for part of their Resource Adequacy Capacity or have submitted a Self-Schedule for part of their Resource Adequacy Capacity must remain available to the CAISO through Real-Time, including capacity reflected in the Day-Ahead Schedule and any remaining capacity, for the scheduled and non-scheduled portions of their Resource Adequacy Capacity, subject to the provisions of Section 40.6.4.

40.6.3 Additional Availability Requirements For Short-Start Units.

Short Start Units must meet the following Real-Time availability requirements:

- 1) Submit a Bid for the resource in the HASP; or
- 2) Submit a Bid for the resource into the Real-Time Market.

The CAISO may waive these availability obligations for Short-Start Units not have not submitted a Bid or Self-Schedule or selected in the IFM or RUC based on the procedure published on the CAISO Website.

40.6.4 Additional Availability Requirements for Use-Limited Resources.

40.6.4.1 Registration of Use-Limited Resources.

Scheduling Coordinators for Use-Limited Resources, other than for hydro Generating Units, must provide the CAISO an application in the form specified on the CAISO Website requesting registration of a specifically identified resource as a Use-Limited Resource. This application shall include specific operating data and supporting documentation including, but not limited to;

- 1) a detailed explanation of why the unit is subject to operating limitations;
- 2) historical data to show attainable MWhs for each 24-hour period during the preceding year. This data should include, as applicable, environmental restrictions for NO_x, SO_x, or other factors.
- 3) further data or other information as may be requested by the CAISO to understand the operating characteristics of the unit.

Within, 5 days upon receipt of the application, the CAISO will respond to the Scheduling Coordinator as to whether or not the CAISO agrees that the facility is eligible to be a Use-Limited Resource. If the CAISO determines the facility is not a Use-Limited Resource, the Scheduling Coordinator may challenge that determination in accordance with the CAISO ADR Procedures.

40.6.4.2 Use Plan.

With regard to Use-Limited Resources, the Scheduling Coordinator will provide by September for the following year, a proposed annual use plan for each Use-Limited Resource that is a Resource Adequacy Resource. The proposed annual use plan will delineate on a month-by-month basis the total MWhs of generation, total run hours, expected daily supply capability (if greater than four hours) and the daily energy limit, operating constraints, and the timeframe for each constraint. The CAISO will have an opportunity to discuss the proposed annual use plan with the Scheduling Coordinator and suggest potential revisions to meet reliability needs of the system. The Scheduling Coordinator shall then submit its final annual plan by October of each year. The Scheduling Coordinator will be able to update the projections made in the annual use plan in the monthly Resource Adequacy Plans. The annual use plan

must reflect the potential operation of the Use-Limited Resource at a level no less than the minimum criteria set forth by the Local Regulatory Authority for qualification of the resource.

40.6.4.3 Bidding Requirements on Use-Limited Resources.

40.6.4.3.1 Non-Hydro and Dispatchable Use Limited Resources.

Use-Limited Resources, other than those subject to the provisions of 40.6.4.3.2, must submit a Supply Bid or Self-Schedule for their Resource Adequacy Capacity in the Day-Ahead Market whenever the Use-Limited Resources are physically capable of operating in accordance with their operating criteria, including environmental or other regulatory requirements. Use-Limited Resources will also provide a daily energy limit as part of its Day-Ahead Market offer to enable the CAISO to schedule them for the period in which they are capable of providing the Energy. To the extent that the daily Energy limit has been Self-Scheduled, no further action is necessary by the CAISO, unless rescheduling of the Energy is necessary for system reliability. Use-Limited Resources will attempt to reschedule the Energy in recognition of the system reliability concern, to the extent that the change is possible without violating a Use-Limited Resource's operating criteria.

40.6.4.3.2 Hydro and Non-Dispatchable Use Limited Resources.

Hydro resources and Non-Dispatchable Use-Limited Resources shall submit Self-Schedule or Bids in the Day-Ahead Market for their expected available Energy or their expected as-available Energy, as applicable, in the Day-Ahead Market and HASP. Such Resources shall also revise their Self-Schedules or submit additional Bids in HASP based on the most current information available regarding expected Energy deliveries. Hydro resources and Non-Dispatchable Use-Limited Resources will not be subject to commitment in the RUC process. The CAISO will retain discretion as to whether a particular resource should be considered a Non-Dispatchable Use-Limited Resource, and this decision will be made in accordance with the provisions of Section 40.6.4.1.

40.6.4.3.3 Availability of Use Limited Resources During System Emergencies.

All Use-Limited Resources remain subject to Section 7.7.2.3 regarding System Emergencies to the extent the Use-Limited Resource is owned or controlled by a Participating Generator.

40.6.5 Additional Availability Requirements for System Resources.

In the IFM, the multi-hour block constraints of the System Resource are honored in the optimization. The CAISO anticipates that multi-hour block System Resources that are Resource Adequacy Resources must be capable of hourly selection by the CAISO if not fully committed in the IFM. If selected in the RUC, the System Resource must be dispatchable in those hours in the HASP and Real Time Market. For existing System Resources with a call-option that expires prior to the completion of the IFM, such System Resources listed on a Resource Adequacy Plan must be reported to the CAISO for consideration in any CAISO multi-day RUC/unit commitment process.

40.6.6 Availability Requirements for Partial Resource Adequacy Resources.

A Partial Resource Adequacy Resource has capacity that is not committed to meet a Resource Adequacy obligation in the CAISO Control Area. Only that output of the resource that is designated by a Scheduling Coordinator as Resource Adequacy Capacity in its monthly or annual Resource Adequacy Plan shall have an availability obligation to the CAISO.

40.6.7 Availability Requirements for Long Start Units.

40.6.7.1 Release of Long-Start Units.

Long-Start Units not committed in the Day-Ahead Market will be released from any further obligation to submit Self-Schedules or Bids for the relevant Operating Day. Scheduling Coordinators for Long-Start Units are not precluded from self-committing the unit after the Day-Ahead Market and submit a Self-Schedule a Wheel-Out in the HASP, unless precluded by terms of its contract or other restrictions.

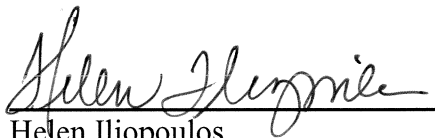
40.6.7.2 Obligation of Long-Start Units to Offer Remaining Capacity in Real-Time.

Long Start Units that have been committed by the CAISO in the Day-Ahead Market or the RUC for part of their Resource Adequacy Capacity or have submitted a Self-Schedule for part of their Resource Adequacy Capacity must remain available to the CAISO through Real-Time for the full value of their Resource Adequacy Capacity.

CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic and United States mail, **REPLY OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION TO THE PETITION TO MODIFY DECISION 05-10-042 OF SOUTHERN CALIFORNIA EDISON COMPANY** in Docket No. R.04-04-003.

Executed on April 3, 2006, at Folsom, California.

A handwritten signature in cursive script, reading "Helen Iliopoulos", written over a horizontal line.

Helen Iliopoulos
An Employee of the California
Independent System Operator

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