

**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)	
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**COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION ON THE DEVELOPMENT OF A LONG-TERM
POLICY FOR EXPIRING QUALIFYING FACILITIES (QF) CONTRACTS**

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Dated: November 10, 2004

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Pursuant to Rule 75 of the Commission’s Rules of Practice and Procedure and Administrative Law Judge Wetzell’s Ruling Requesting Proposals and Comments on the Development of a Long-Term Policy for Expiring Qualifying Facilities (QF) Contracts, issued September 30, 2004, the California Independent System Operator Corporation (CAISO) respectfully submits these comments. These comments relate to two areas of interest to the CAISO that it believes should be clarified by the California Public Utilities Commission (Commission) in developing a long-term policy for QFs. First, the Commission should clearly state that, unlike QFs with contracts that predate the formation of the CAISO, QFs executing new contracts will not be exempted from CAISO Tariff requirements. Second, the Commission should specify that QFs seeking to interconnect or modify an existing interconnection at the transmission level should be required to comply with the CAISO’s interconnection process.

I. QFs WITH NEW CONTRACTS SHOULD BE SUBJECT TO THE CAISO’S TARIFF

Section 2.2.1 of the CAISO’s *pro forma* Participating Generator Agreement (PGA) and the CAISO’s *pro forma* QF-PGA, currently pending approval in Federal Energy Regulatory

Commission (FERC) docket No. ER98-997 *et al.*, exempts certain Generators¹ with an existing power purchase contract with a utility from the requirement that they enter into a PGA or QF-PGA with the CAISO. The exemption extends to contracts entered into and effective as of December 20, 1995,² pursuant to which the QF sells all of its Energy (except for auxiliary load) and Ancillary Services to the utility or sells any Energy through “over the fence” arrangements authorized under California law.³ In addition, Section 5.1.5 of the CAISO’s Tariff requires the CAISO to honor the contractual rights and obligations of “Regulatory Must-Take” (RMT) generators whose operation is not subject to competition, as identified by the Commission.⁴ The QF exemption has been in effect since market start-up as part of the CAISO’s original *pro forma* PGA⁵ and is reflected elsewhere in the CAISO’s Tariff.⁶ The reason for exempting, or “grandfathering,” QFs with contracts that predate the creation and design of the CAISO markets was to protect the pre-existing contractual expectations of the parties. These pre-existing contracts include provisions regarding matters such as outage coordination, operations during system emergencies, and scheduling and settlement of power deliveries that are in some cases inconsistent with the provisions of the *pro forma* PGA and the CAISO’s Tariff with regard to the CAISO’s role as the new operator of the transmission system and the Control Area.

¹ Capitalized terms have the meaning set forth in Appendix A, Master Definitions Supplement to the CAISO Tariff.

² The relevant date is December 31, 1996, if the Generator employs landfill gas technology.

³ The exemption does not extend to Generators that participate in the CAISO’s markets. Even if a QF has an “over the fence” arrangement, the QF will be required to enter into a QF-PGA (or standard PGA) if it chooses to participate in the CAISO’s markets.

⁴ Section 5.15 of the CAISO’s Tariff provides, “Notwithstanding any other provision of this ISO Tariff, the ISO shall discharge its responsibilities in a manner which honors any contractual rights and obligations of the parties to contracts, or final regulatory treatment, relating to Regulatory-Must-Take Generation of which protocols or other instructions are notified in writing to the ISO from time to time and on reasonable notice.”

⁵ See the CAISO’s June 1, 1998 compliance filing in Commission Docket Nos. EC96-19-029 and ER96-1663-030.

⁶ See *e.g.* CAISO Metering Protocol MP § 13.5.2.vi exemption concerning QFs with contracts effective as of December 20, 1995, if PPA is inconsistent with the CAISO’s Metering Protocol; the CAISO’s Dispatch Protocol §

Accordingly, rather than attempt to require QFs with these pre-existing contracts to conform to the requirements applicable to all other Generators subject to the *pro forma* PGA and the CAISO's Tariff, the CAISO preserved the expectations and contractual rights and obligations of QFs with these pre-existing contracts. The CAISO has worked, and continues to work, with the utilities to ensure the reliability of CAISO Control Area operations, notwithstanding the inconsistency of the requirements applicable to pre-existing QF contracts. For similar reasons, the requirement for the CAISO to honor RMT contracts generally has also been in effect since market start-up as part of the CAISO's Tariff.

There is no justification for exempting or grandfathering QFs with new contracts or for the Commission's creation of any new RMT contracts. Given that the prospective parties to new contracts are fully aware of the CAISO's requirements, there is no reason for the new contracts to be inconsistent with the CAISO's requirements and the QFs should have the direct contractual relationship with the CAISO through the QF-PGA. The development of the *pro forma* QF-PGA has been the subject of extensive proceedings before FERC, in which FERC has in many cases directed the CAISO to adopt provisions advocated by representatives of the QF community. Having specifically tailored the QF-PGA to the needs of QFs, the CAISO feels strongly that it should serve as the standard vehicle for establishing the relationship between the CAISO and all QFs not grandfathered under a pre-existing contract. Accordingly, the CAISO requests that the Commission specify that new QF contracts, or any extension of an existing QF contract, be drafted in a manner consistent with the CAISO's Tariff and require the QF to enter a PGA or QF-PGA and comply with all applicable CAISO operating and scheduling protocols.

9.4.2 applies to QFs that have entered into a contract prior to March 31, 1997, and specifies that the outage coordination is subject to the existing contract.

The CAISO also requests that the Commission make clear that any new contracts established for QFs are not RMT contracts and are “subject to competition.” In doing so, the Commission would facilitate the CAISO’s efficient and reliable operation of the transmission grid. The CAISO must dispatch resources to accommodate RMT Energy, which may increase costs to consumers and, to the extent such resources are located in generation pockets, may effect system reliability.

II. QFs INTERCONNECTED WITH THE CAISO CONTROLLED GRID SHOULD BE SUBJECT TO THE CAISO’S INTERCONNECTION PROCESS

QFs that are interconnected to the CAISO Controlled Grid should be required to comply with the CAISO’s interconnection process in connection with any changes that may be necessary to accommodate new contracts. The CAISO believes that Rule 21 interconnections should continue to be limited to generation resources interconnected to the distribution system owned and controlled by one of the investor-owned utilities. The CAISO has a standard interconnection process that provides consistent, non-discriminatory access to the transmission system comprising the CAISO Controlled Grid applicable to all generators. Included in that interconnection process is a queuing process that ensures fair and timely treatment of all requests for new interconnections or modifications affecting an existing interconnection. It would be disruptive to this standardized, non-discriminatory transmission system interconnection process for the Commission to establish a different set of rules for the interconnection of QFs to the transmission system (or for modifications to existing QF projects that would have an effect on a QF’s interconnection to the transmission system).

Moreover, a basic feature of the CAISO interconnection process is the production of reliability studies to ensure that reliability upgrades required for a new interconnection to the transmission system are properly identified and associated with the project that has caused the

need for such upgrades. There have been, and will continue to be, instances where a single interconnection project may impact the reliability of more than one investor-owned utility's portion of the interconnected grid. The CAISO's interconnection process ensures that the overall impacts are assessed. As a result, the reliability studies conducted pursuant to the CAISO's interconnection process are necessary for all transmission level interconnection and it is simply not possible for an investor-owned utility to accommodate QF interconnections to the CAISO Controlled Grid without CAISO participation. Thus, the Commission should clarify that QFs seeking to interconnect to the transmission system to accommodate new or modified contracts should be required to comply with the CAISO's interconnection process.


Such Commission clarification in this regard is fully consistent with state law. AB 1890 transferred responsibility for ensuring grid reliability from the investor-owned utilities and the Commission to the CAISO. Public Utilities Code § 345 states that "[t]he Independent System Operator shall ensure efficient use and reliable operation of the transmission grid consistent with achievement of planning and operating reserve criteria no less stringent than those established by the Western Systems Coordinating Council and the North American Electric Reliability Council." Further, Public Utilities Code § 334 provides explicitly that "[t]he proposed restructuring of the electric industry would transfer responsibility for ensuring short- and long-term reliability away from electric utilities and regulatory bodies to the Independent System Operator" In contrast, the CAISO has no position regarding the Commission's rules for interconnections to a utility's distribution system, and the CAISO Tariff acknowledges that such interconnections are the province of the utilities and the Commission.

III. CONCLUSION

The CAISO respectfully requests that, in developing its long-term policies for QFs with expiring QF contracts, the Commission recognize that creating discrepancies in the treatment of Generators interconnected to the CAISO Controlled Grid undermines the ability of the CAISO to operate the transmission grid reliably and efficiently. Therefore, QFs interconnected with the CAISO Controlled Grid must be treated similarly to other Generators and, in particular, the Commission should specify that (1) QFs executing new contracts will not be exempted from CAISO Tariff requirements and (2) QFs seeking to interconnect or modify an existing interconnection at the transmission level in order to export energy should be required to comply with the CAISO's interconnection process.

November 10, 2004

Respectfully Submitted:

By: 

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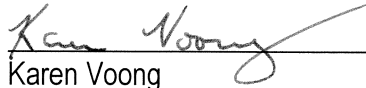
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CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic mail, a copy of the foregoing Comments of the California Independent System Operator Corporation on the Development of a Long-Term Policy for Expiring Qualifying Facilities (QF) Contracts to each party in Docket No. R.04-04-003.

Executed on November 10, 2004, at Folsom, California.

A handwritten signature in cursive script, appearing to read "Karen Voong", is written over a horizontal line.

Karen Voong
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