

Stakeholder Comments Template

Resource Transitions

*Resource Adequacy Deliverability Assessment
for Resources Transitioning
from Outside to Inside the ISO Balancing Authority Area*

Submitted by	Company	Date Submitted
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This template is for submission of stakeholder comments on the topics listed below, covered in the *Resource Transitions: Resource Adequacy Deliverability Assessment for Resources Transitioning from Outside to Inside the ISO Balancing Authority* Issue Paper posted on February 11, 2011, and issues discussed during the stakeholder conference call on February 18, 2011, including the slide presentation.

Please submit your comments below where indicated. Your comments on any aspect of the Resource Transitions initiative are welcome. If you provide a preferred approach for a particular topic, your comments will be most useful if you provide the reasons and business case.

Please submit comments (in MS Word) to ResTrans@caiso.com no later than the close of business on March 2, 2011.

- Preferred Option** – Do you have a preference for any one of the three options presented in the issue paper and why?

At this time CPUC staff prefers option 2, as this appears to provide a good balance between the competing interests of maintaining RA capacity availability, but places the generator into the General Interconnection Process (GIP) like any other resource desiring to establish RA deliverability within the CAISO balancing authority area. Option 2 also provides the most flexibility for facilitating the transition of resources from neighboring Balancing Authority Areas (BAAs) into the CAISO BAA and allows reasonable recognition of interim RA capacity deliverability.

2. **Objection to Option** – Do you have a strong objection to any of the three options presented in the issue paper and why?

CPUC staff thinks it would be unfair to establish a more permanent capacity deliverability value based on prior imports, without going through the GIP which other internal resources are subjected to. Doing so would provide further incentives for generators to seek to transition their resource to an internal CAISO interconnection.

3. **Providing Deliverability to Resource versus to Load Serving Entity** – What is your view on providing deliverability capability to a transitioning generating unit versus a load serving entity, recognizing that prior to the transition the maximum import capability to which the generating unit's historical schedules contributed was allocated to load serving entities?

CPUC staff believes that if the generating resource can substantiate their RA deliverability capacity provided over the intertie, then whether they are providing that deliverability through the LSE proxy or as a transitioning generation unit within the CAISO, that RA capacity should be utilizable until such time as the GIP is completed.

4. **Other Options** – Please describe any other viable options the ISO should consider, in addition to the three options identified in the issue paper. If you prefer one of these other options, please explain why and how any additional options address equity issues such as those described in item 3 above.
5. **Other Comments** – If you have any additional comments, please provide them here.