

**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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**REPLY COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
ON OPINION ON PETITIONS FOR MODIFICATION OF DECISION 05-10-042**

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Dated: December 11, 2006

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In accordance with Rule 14.3 of the Commission’s Rules of Practice and Procedure, the California Independent System Operator Corporation (“CAISO”) hereby replies to comments submitted in response to Administrative Law Judge Wetzell’s proposed “Opinion on Petitions for Modification of Decision 05-10-042” issued on November 14, 2006 (“Proposed Opinion”).

I. AReM’s Proposed Changes To Import Delivery Points Have Merit, But Should Be Accommodated By Reference CAISO “Scheduling Points”

The Proposed Opinion endorses clarifying the delivery point requirements necessary for “firm import LD contracts” to qualify as a resource adequacy capacity. (Proposed Opinion at 4-5.) AReM correctly observes, however, that the Proposed Decision appears to have inadvertently omitted the phrase allowing a firm delivery point at “an interconnection with the CAISO Control Area” in addition to at an “inter-tie.” (AReM Comments at 3.) AReM further notes, “neither ‘inter-tie’ nor ‘interconnection with the CAISO Control Area’ is a delivery point traded in the wholesale market.” (*Id.*) To address this concern, AReM proposes to add the phrase “or an external trading hub” as an option along with “inter-tie” and “interconnection with the CAISO Control Area.”

The CAISO agrees with AReM that the term “inter-tie” is imprecise and that reference to “an interconnection with the CAISO Control Area” should be inserted. Consistent with this view the CAISO suggests the term inter-tie be removed and replaced by “CAISO Scheduling Point” to add clarity to the meaning of interconnection with the CAISO Control Area. A Scheduling Point under the CAISO Tariff is:

A location at which the ISO Controlled Grid is connected by a group of transmission paths for which a physical, non-simultaneous transmission capacity rating has been established for Congestion Management, to transmission facilities that are outside the ISO's Operational Control. A Scheduling Point typically is physically located at an 'outside' boundary of the ISO Controlled Grid (e.g., at the point of interconnection between a Control Area utility and the ISO Controlled Grid). For most practical purposes, a Scheduling Point can be considered to be a Zone that is outside the ISO's Controlled Grid¹

The CAISO expressly identifies Scheduling Points as part of establishing "Wheeling Rates." (See, e.g., <http://www.caiso.com/docs/2003/09/16/2003091611045716176ex.html>.) Accordingly, the Proposed Opinion should alter Decision 05-10-042 to require exempt firm import LD contracts to specify a firm delivery point at "an interconnection with the CAISO Control Area or an CAISO Scheduling Point."

The CAISO is also sympathetic to AReM's desire to align resource adequacy requirements with accepted commercial standards by including the option of delivering at an "external trading hub." However, as drafted, the proposal conflicts with, if not the letter, but the spirit of, other requirements for a firm import LD contract to qualify as a resource adequacy resource.

D.05-10-042 noted that a firm import LD contract will constitute Qualifying Capacity if "the contract (1) is an Import Energy Product with operating reserves, (2) cannot be curtailed for economic reasons, and either (a) is delivered on transmission that cannot be curtailed in operating hours for economic reasons or bumped by higher priority transmission or (b) specifies a firm delivery point."² The fundamental objectives of the foregoing requirements is to ensure that the Energy is first, deliverable to California via acceptably firm transmission rights, at which point the load serving entity must possess a sufficient allocation of resource adequacy import capacity, and, second, that it is being sourced from a resource outside the CAISO Control Area. AReM's proposal addresses the second objective, but in doing so seems to ignore the requirement that the Energy must make it to California to be useful in meeting resource adequacy.

Not all external trading hubs include facilities that interconnect with the CAISO Controlled Grid. An example of this is Mid-Columbia or "Mid-C." Therefore, a contract that provided for a supplier to deliver Energy to a load serving entity at Mid-C would not satisfy the intent of the resource adequacy

¹ CAISO Tariff at Appendix A, Original Sheet No. 526.

² D.05-10-042 at 67.

requirements because the contract itself fails to demonstrate compliance with one of the basic resource adequacy objectives - an ability to subsequently transmit the Energy from the trading hub to the CAISO Controlled Grid. In this scenario, an additional transaction by the load serving entity to obtain transmission rights from Mid-C to a Scheduling Point would be necessary.

However, some western trading hubs do correspond to CAISO Scheduling Points, i.e., Palo Verde. Accordingly, the CAISO recommends that the Proposed Opinion recognize AREM's recommendation again by including the reference to CAISO Scheduling Points. This reference itself will differentiate between those trading hubs that comply with the underlying objectives of resource adequacy and those that do not.

II. The Narrow Exemption of A Specific Type of System Resource or Import Is Consistent with Grid Reliability

The CAISO's opening comments focused on the post-MRTU time frame. However, Powerex in its comments notes that "[u]nder pre-MRTU, the real-time offer requirement would be even more valuable to the CAISO given the absence of any mechanism to commit the RA imports in the Day Ahead time frame." (Powerex Comments at 7.) Powerex is correct. Indeed, in the pre-MRTU time period, the absence of an ability by the CAISO to utilize imports prior to the real-time market to meet reliability needs requires that the real-time obligation on imports persist up until implementation of MRTU. The CAISO, therefore, recommends that the Proposed Opinion specify that any modification to an import's offer obligation would commence only upon the implementation of MRTU as described below.

After MRTU, the Integrated Forward Market ("IFM") and Residual Unit Commitment ("RUC") process provide the CAISO with mechanisms to make efficient and informed decisions regarding the use of import resources to meet expected reliability needs in the operational time period. As a result, the CAISO stated in its opening comments that the import offer obligation can be refined upon implementation of MRTU. Again, as previously indicated, there are four different categories of System Resources (generally imports) under the CAISO Tariff. The categories turn on whether the System Resource is associated with a specific generating source and/or has dynamic scheduling functionality. The four categories are:

1. Dynamic Resource-Specific System Resources
2. Non-Dynamic Resource-Specific System Resource
3. Dynamic System Resource (non-resource specific)
4. Non-Dynamic System Resource (non-resource specific)³

Dynamic scheduling essentially allows for the real-time electronic exchange of Energy and Ancillary Service scheduling data between the CAISO and an adjacent control area such that external resources can be dispatched in real-time to serve load in the CAISO Control Area. It follows that Dynamic Non-Resource-Specific System Resources should be required to be available to the CAISO through real-time, i.e., have an obligation to bid into the Hour-Ahead Scheduling Process (“HASP”) if not previously committed in the IFM or RUC.

Resource-Specific System Resources, whether dynamically scheduled or not, should be treated in accordance with the physical characteristics of the underlying resource as submitted by the resource-owner to the CAISO Master File and therefore no uniform exemption for this category is appropriate. In other words, the Resource-Specific System Resource will be treated similarly to internal resources with like characteristics. As such, any Resource-Specific System Resource procured for resource adequacy purposes that falls within the parameters of a Short-Start Unit must bid into the HASP when physically capable. In contrast, Resource-Specific System Resources that are Long-Start Units will be released from a real-time obligation if not committed in the IFM or RUC.

Finally, as noted in its opening comments, Non-Dynamic System Resources may be exempted from a real-time offer obligation, but that determination entails balancing competing factors. On the one hand, the CAISO disagrees with PG&E’s concern that “[i]f RA import products that are not selected in the IFM/RUC are not obligated to submit bids in the HASP, the CAISO may feel compelled to be overly conservative during the RUC process with respect to imports.” (PG&E Comments at 4.) Given the CAISO’s RUC commitment will be based on the same constraints as the IFM and on forecasted load plus Ancillary Services requirements, PG&E’s concern regarding over-commitment of imports should not arise.

³ Some typographical errors in the CAISO’s opening comments may have added some confusion with regard to the four categories.

On the other hand, the scenario outlined by PG&E where an unexpected heat-wave occurs after the close of the Day-Ahead Market, which can happen, but is infrequent, can impact system reliability to the extent insufficient Short-Start Units are available and Non-Dynamic System Resources have no real-time offer obligation. In general, the CAISO recognizes that over-reliance on Short-Start Units under all system conditions can pressure the availability of such units during critical periods given run-limitations and potential increases in forced outage rates. However, by relieving Non-Dynamic System Resources from a real-time obligation if not committed in the Day-Ahead Market, the pool of external resources that may be eligible to provide resource adequacy capacity is likely to be increased.⁴ This fact, together with the likelihood that Non-Dynamic System Resources submit \$0 availability bids and are unlikely to have start-up and minimum load costs, increase the chance that such resources will be used when needed.

III. Conclusion

For the foregoing reasons, the CAISO respectfully requests that the Commission adopt the Proposed Opinion with the modifications recommended by the CAISO. recommendations.

December 11, 2006

Respectfully Submitted:

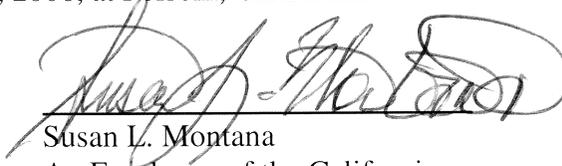
By: 
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⁴ However, even this position is balanced by a potential negative under the current resource adequacy paradigm. The resource adequacy product presently does not explicitly differentiate the value of various resources that provide reliability services, such as Short-Start or Load-Following resources. The absence of a real-time obligation on Non-Dynamic System Resource exacerbates this problem by allowing such resources to compete with Short-Start Units. This, in turn, may adversely impact the ability of the resource adequacy program to provide the revenue stream needed to ensure that sufficient Short-Start Units remain available to California consumers.

CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic and United States mail, the Comments of the California Independent System Operator Corporation on Opinion on Petitions for Modifications of Decision 05-10-042 in Docket No. R.04-04-003.

Executed on December 11, 2006, at Folsom, California.

A handwritten signature in black ink, appearing to read "Susan L. Montana", written over a horizontal line.

Susan L. Montana
An Employee of the California
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