

**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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**COMMENTS OF THE  
CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR CORPORATION  
ON THE PROPOSED OPINION ON PHASE 2 – TRACK 1 ISSUES**

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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”) respectfully submits its comments on Administrative Law Judge (“ALJ”) Wetzell’s draft decision entitled “Opinion on Phase 2 – Track 1 Issues,” mailed May 22, 2007, in the above-referenced proceeding (“Draft Decision”).

**I. INTRODUCTION**

The CAISO again commends ALJ Wetzell and Commission staff for conducting productive, proactive workshops and formulating a cogent Draft Decision that, if adopted by the Commission, will further enhance the existing resource adequacy program. Specifically, the CAISO strongly supports the Draft Decision’s acceptance of the “Path 26 Counting Constraint” proposal to address reliability concerns arising from the limited transfer capability across Path 26 and its adoption of the CAISO’s 2008 Local Capacity Requirements Study (“LCR Study”) as the foundation for local capacity procurement obligations. In this latter regard, the CAISO concurs with the Draft Decision that

improvements to the LCR Study process are warranted and the CAISO looks forward to collaborating with the Commission and other stakeholders in achieving this objective.

The CAISO, however, urges the Commission to make three modifications to the Draft Decision. First, the Final Decision should directly address the counting of demand response (“DR”) for resource adequacy purposes, rather than deferring consideration to Rulemaking 07-01-041. Second, the Commission should clarify that in order to conserve limited Commission resources, and maintain the focus of Track 2, market participants must first fully develop a standardized capacity product prior to the commencement of Commission and CAISO review. Third, the Commission should revise the temperature assumption in the current resource adequacy program from 1-in-2 to 1-in-10 so that the present planning reserve margin results in procurement outcomes that more closely converge with observed procurement practices and risk tolerance.

## **II. DISCUSSION**

### **A. The CAISO Is Committed to Improving the LCR Study Process**

As noted above, the CAISO agrees with the Draft Decision that “[i]mprovements to the LCR study process for 2009 and beyond are both needed and achievable.”<sup>1</sup>

Modifications to the study schedule offer the greatest opportunity for improvement. A schedule must be devised that allows the CAISO reasonable time to develop and share LCR Study results with stakeholders, while continuing to provide Load Serving Entities (“LSEs”) sufficient time to procure resource adequacy capacity. Specifically, schedule improvements should seek to:

- Provide for the timely submission of operating solutions that can be incorporated into the initial draft of the LCR Study;

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<sup>1</sup> Draft Decision at 28.

- Provide an opportunity to review and discuss LCR Study input assumptions and methodology with stakeholders prior to conducting the study; and
- Provide an opportunity for input from stakeholders on draft LCR Study results well in advance of producing the final LCR Study report.

Such improvements will ensure that stakeholders have the ability to engage the CAISO in the development of the LCR Study and, in the end, bring greater transparency to the overall process. In this regard, the CAISO, as part of its transmission planning compliance obligations pursuant to Federal Regulatory Energy Commission Order No. 890 as well as MRTU implementation process, has proposed a “straw” LCR Study schedule.<sup>2</sup> The CAISO is committed to working with the Commission and stakeholders in the Order No. 890 process to develop a mutually beneficial LCR Study schedule that can help eliminate the perceived difficulties with the current process.

**B. The Counting of Resource Adequacy Capacity from Demand Resources Should Be Addressed in this Proceeding**

The CAISO appreciates the Draft Decision’s recognition that DR programs should be “both attractive to customers and closely coordinated with the CAISO’s day-ahead market processes” and that “it may be appropriate to work toward the eventual exclusion of emergency based DR programs from the RA program.”<sup>3</sup> However, the deferral of this issue to R.07-01-041 (“DR Rulemaking”) and until further “consideration of modification to DR programs needed to support the CAISO’s efforts to incorporate

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<sup>2</sup> See, CAISO Order No. 890 Straw Proposal at pg. 31, <http://www.caiso.com/1bda/1bdab40d5960.html>.

<sup>3</sup> Draft Decision at 41

DR into market design protocols”<sup>4</sup> will not timely address the CAISO’s concern that emergency-triggered programs are incompatible with the fundamental goal of resource adequacy. The CAISO believes the Commission’s intention in adopting the resource adequacy program is to provide the CAISO with sufficient capacity to reliably operate the system without the declaration of system emergencies. If so, a continuation of the current counting metric for approximately 1,500 MW of DR programs jeopardizes this intention by removing the availability obligation of such large quantity of resources absent an emergency. This concern exists regardless of other important program modifications that may be necessary and/or appropriate under the CAISO’s new market design.

In its April 20, 2007 post-workshop reply comments, the CAISO provided historical data demonstrating that emergency and interruptible DR programs could be triggered prior to a Stage 1 emergency, i.e., at the Alert or Warning Stage, and not jeopardize the number of allowable events under these programs.<sup>5</sup> The CAISO’s proposal is consistent with the intended purpose of these DR programs, which is to provide relief during stressed system conditions. Thus, allowing these programs to be triggered just prior to a declared emergency would largely ameliorate the CAISO’s concern regarding how these DR programs qualify and count for resource adequacy purposes, while conforming to the spirit of the Commission’s resource adequacy program, and avoiding the circumstance where the CPUC RA program success is measured in the quantity of declared system emergencies..

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<sup>4</sup> *Id.*

<sup>5</sup> See *Post-workshop Reply Comments of the California Independent System Operator Corporation on Resource Adequacy Phase 2, Track 1 Proposals*, p. 13.

Finally, the CAISO is unclear how the DR Rulemaking could accommodate and rule on the “counting” of demand resources for RA capacity given the specific elements under consideration in that proceeding. The issue seems to be caught between two separate rulemakings. The CAISO, therefore, believes the counting of capacity from emergency-triggered DR resources and a mechanism for the eventual phase-out or transition to a different trigger should be developed and ruled on in Phase 2 of this proceeding.

**C. The Commission and CAISO Should Look to Market Participants to Provide a Fully Developed Standardized Product Proposal**

The CAISO has repeatedly acknowledged the value made by Calpine and other parties in developing a standardized capacity product to facilitate the creation of a more liquid market for capacity. The CAISO again reiterates its support for this effort and the need for participation by the CAISO and the Commission. However, the CAISO does not believe that expansion of the scope of Track 2 is necessary given the time and resource constraints confronting both the Commission as well as the CAISO. Instead, many of the issues to be resolved relate to commercial terms that must be, in the first instance, developed, debated, and accepted by market participants in order to be effective. Therefore, the Commission and the CAISO should look to the leadership of market participants to fully develop a proposal, which when completed, can be advanced for regulatory review. This leaves the timing largely in the control of market participants and allows the Commission the opportunity to both address this issue in a discrete manner and proceed with Track 2 without any change in scope.

**D. The Commission Should Revise the Resource Adequacy Obligation to Meet Demand Based on One-in-Ten Year Temperature Forecast**

Although the issue of the appropriate planning reserve margin (“PRM”) was highlighted in the Phase 2, Track 2 ALJ Ruling, the CAISO believes this issue constitutes an essential consideration not only for the long-term resource adequacy program, but also for the current interim resource adequacy design and should be considered in Track 1. With respect to the current interim resource adequacy design, the PRM is 15-17% on a 1-in-2 temperature peak demand forecast. The CAISO has repeatedly advocated that the current PRM is more consistent with application of a 1-in-10 temperature peak demand forecast. In its comments on the Track 2 proposals, submitted on March 30, 2007, the CAISO justified the use of the 1-in-10 temperature forecast by noting that the PRM must account for minimum operating reserves, regulation, forced outages, and normal load forecast error not related to temperature variation, i.e., economic growth. With average generator forced outage rates during weekday peak hours of approximately 6%, there is very little margin to accommodate non-temperature related forecast error or, more importantly, a load level resulting from above 1-in-2 temperatures.

In fact, the procurement behavior reflected in the 2006 resource adequacy program also suggests that LSEs are more comfortable with the level of insurance associated with a greater procurement obligation. As set forth in Table 3 of the Commission’s Final Resource Adequacy Report, dated March 16, 2007, LSEs procured will in excess of the 15% PRM in all summer months. For compliance year 2008, and therefore before the conclusion of Track 2, the Commission should revise the temperature assumption in the current resource adequacy program so that the PRM results in

procurement outcomes that more closely converge with LSE practice and desired risk tolerance.

### **III. CONCLUSION**

The CAISO respectfully requests that the Commission adopt the Draft Decision as modified in accordance with the foregoing discussion.

Respectfully submitted,

*/s/Grant A. Rosenblum*

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Attorney for  
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CERTIFICATE OF SERVICE

I hereby certify that on June 11, 2007 I served, by electronic mail and United States Mail, a copy of Post-Workshop Reply Comments Of The California Independent System Operator Corporation On Resource Adequacy Phase 2, Track 1 Proposals on all parties in Docket Number R. 05-12-013.

DATED at Folsom, California on June 11, 2007.

/s/ Susan L. Montana

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