

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

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Dated: June 18, 2007

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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 reply comments to the submissions of other parties to Administrative Law Judge (“ALJ”) Wetzell’s draft decision entitled “Opinion on Phase 2 – Track 1 Issues,” mailed May 22, 2007 (“Draft Decision”).

I. THE DRAFT DECISION PROPERLY ADOPTS THE CAISO’S 2008 LOCAL CAPACITY REQUIREMENT STUDY AS A BASIS FOR LSE PROCUREMENT

A. Intertie Outages Are Appropriate Contingencies

Southern California Edison (“SCE”) objects to the contingencies used by the CAISO to determine the local capacity requirements in SCE’s service territory. In one of the CAISO’s original filings on creating an LCR, the CAISO was explicit that it “must account for contingencies on the entire CAISO Controlled Grid, including maintaining

flow levels below all established path ratings, including 500 kV.”¹ The CAISO further noted that the Local Area Reliability Service analysis underlying Reliability Must-Run designations did not consider 500 kV path mitigation because it was assumed that such flows would be maintained through market mechanisms. This assumption proved false, resulting in reliance on must-offer generation. To address this tangible need the CAISO has consistently and transparently proposed to address this reliability need through the LCR.

What SCE does not appear to appreciate is that although any contingency may be considered, it is only when the resulting overloaded element is a local facility will a local requirement be triggered. In the case of LA Basin, the loss of one Songs unit followed by the loss of Palo Verde – Devers #1 550 kV line causes an overload on the South of Lugo path, a local path.² It is local because only certain units, in this case units South of Lugo, not North of Lugo, are effective (given the minimum threshold) in relieving the constraint. If it were zonal, generally all units in the zone would be effective to the minimum threshold in resolving the reliability concern. The Draft Decision, therefore, properly recognized this underpinning of the CAISO’s LCR Study.

B. Existing Waiver Protections Preclude the Need to “Phase-In” the LCR Requirements Related to Big Creek/Ventura

SCE and TURN argue that the Commission should permit a more gradual “phase-in” of the Big Creek/Ventura local area by not imposing a minimum procurement obligation for that local area on LSEs for 2008 or, at a minimum, by exempting LSEs from penalties for non-compliance with the procurement requirement. The CAISO’s

¹ *Proposal of the California Independent System Operator Corporation Regarding Local Resource Adequacy Requirements*, R.05-12-013 (Jan. 31, 2006) at pg. 4.

² *2008 Local Capacity Technical Analysis – Report and Study Results*, (April 3, 2007) at pg. 69.

interest is in minimizing its own involvement in backstop procurement to satisfy reliability standards. As such, the CAISO does not believe the Commission should adopt policies that increase the probability of CAISO backstop procurement by prospectively narrowing the obligation on LSEs. Instead, the Draft Decision properly relies on the existing waiver request safeguards included in D.06-06-064. Should LSEs prove to be unable to procure capacity at a competitive price in the Big Creek/Ventura local area, the Commission's waiver mechanism provides a means to exempt the LSE from further procurement requirements as well as exposure to penalties. Nothing more is required.

II. THE DRAFT DECISION'S APPROACH TO IMPLEMENTING A PROBABILISTIC LCR ANALYSIS IS APPROPRIATE

CMUA and DRA suggest that the Draft Decision be amended to create a more prescriptive schedule for implementing an LCR Study based on a probabilistic analysis. The CAISO believes the Draft Decision's approach to ensuring a transition to a probabilistic approach is appropriate and should not be changed.

As noted in the Draft Decision, the CAISO is committed to developing and incorporating a probabilistic analysis into its grid planning process for potential integration into resource adequacy planning. The Draft Decision further correctly acknowledged that development of a probabilistic approach must be consistent with other competing regulatory priorities. The collaborative bi-monthly reporting requirement proposed by the Draft Decision provides both the necessary flexibility to adapt to exigencies and the ability of the Commission to detect early on any challenges to meeting the expectations of the Commission and parties. Accordingly, the CAISO believes the currently proposed status/progress report properly addresses the concerns expressed by CMUA and DRA.

III. THE COMMISSION SHOULD ADOPT THE PATH 26 COUNTING CONSTRAINT

DRA contends that the Path 26 Counting Constraint proposal may inappropriately rely on resources from outside California for purposes of netting across Path 26. The CAISO does not share DRA's concern. Zonal capacity needs are satisfied by both physical resources within the zone and qualified resource adequacy imports deliverable to the zone. Additionally, the Path 26 Counting Constraint proposal was designed to ensure that the physical transfer capability ratings on Path 26 are not exceeded for resource adequacy counting purposes even under worst-case "netting" scenarios. Illustrative examples of such scenarios were provided in the Joint Parties' proposal filed on March 22, 2007.³ Consequently, the Draft Decision requires no modification.

IV. THE DRAFT DECISION SHOULD NOT BE MODIFIED REGARDING A SEASONAL LCR ANALYSIS

CMUA remarks that "[t]he cost/benefit analysis of whether a seasonal LCR will result in sufficient cost savings is appropriately within the jurisdiction of the respective regulator, not the CAISO."⁴ The CAISO acknowledges the central role of LRAs in establishing resource adequacy programs. However, it is not true that the CAISO must be ambivalent regarding issues concerning revenue adequacy. Resource adequacy is inextricably linked to revenue adequacy, which is, in turn, inextricably linked to both the design of energy markets and ultimately system reliability. As the Commission thoughtfully noted:

³ See, *Joint Proposal of the California Independent System Operator Corporation, Pacific Gas and Electric Company (U 39 E), San Diego Gas & Electric Company (U 902 E), Southern California Edison Company (U 338 E), and The Utility Reform Network to Implement a Path 26 Counting Constraint in the CPUC's Resource Adequacy Program*, R.05-12-013 (March 22, 2007) at pg. 17.

⁴ *Comments of the California Municipal Utilities Association on the Phase Two, Track One Proposed Decision* at pg. 6.

“... reliability and generator economics cannot reasonably be de-linked. It is axiomatic that those who risk funds to develop the generation capacity California needs should have an opportunity to recover their investment costs and a reasonable return commensurate with the risk. A discussion of the means to achieve reliability necessarily encompasses a discussion of revenue adequacy.”⁵

The Commission has clearly stated its policy that resource adequacy and revenue adequacy are two sides of the same coin and “an RAR program that does not address the need for a return on investment would fail in ‘laying a foundation for the required infrastructure investment.’”⁶ Thus, the CAISO believes revenue adequacy is a fundamental precept of any resource adequacy program and, therefore, is appropriately considered in the design of that program.

CMUA also notes that the cost/benefit arguments focus on fixed costs “and reflects a merchant generator model” and “for many CMUA members peaking units are owned, not under contract with a merchant generator.”⁷ This scenario may be the case for some CMUA members; however, it is not the case for all or for the majority of CPUC jurisdictional LSEs. Thus, revenue adequacy concerns persist given the reliance on merchant generation in the majority of LSE portfolios. The Draft Decision’s current acceptance of an annual LCR is therefore appropriate, yet provides a reasonable path for proceeding into the future.

Dated: June 18, 2007

Respectfully submitted,

/s/ Grant Rosenblum
Grant Rosenblum

⁵ D.05-10-042 at pg. 8.

⁶ Id. at pg. 9.

⁷ Comments of CMUA at pg. 6.

CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic and United States mail, Reply Comments of The California Independent System Operator Corporation on the Proposed Opinion on Phase 2 - Track 1 Issues in Docket No. R.05-12-013.

Executed on June 18, 2007, at Folsom, California.

/s/ Charity N. Wilson

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