

**BEFORE THE  
PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Consider	)	
Annual Revisions to Local Procurement	)	R.08-01-025
Obligations and Refinements to the	)	
Resource Adequacy Program	)	
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**REPLY COMMENTS OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION  
ON PROPOSED DECISION**

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Pursuant to Rule 14.3 of the Commission’s Rules of Practice and Procedure, the California Independent System Operator (“CAISO”) submits the following reply to party comments on the proposed decision of Administrative Law Judge Wetzell, issued on May 27, 2008, and entitled “Decision Adopting Local Procurement Obligations for 2009 and Refinements to the Resource Adequacy Program” (“Proposed Decision”).

The CAISO provides reply comments related to the following topics addressed in the Proposed Decision: (1) rules for counting new resources for local resource adequacy (“RA”) purposes; (2) timing of updates to the CAISO Net Qualifying Capacity (“NQC”) report; (3) coordination between Proposal 8 and possible CAISO backstop procurement; and (4) clarification regarding what constitutes a “dispatchable” QFs.

**I. Rules for Counting New Resources for Local RA**

Pacific Gas and Electric Company (“PG&E”) requests the PD be amended to clarify that new resources may be counted toward local RA obligations in the year-ahead demonstrations if the LSE also demonstrates local procurement sufficient to cover its obligations in the months preceding the expected commercial operation of the new resource. The CAISO supports this clarification. In short, the flexibility incorporated

into the PG&E proposal provides LSEs with anticipated benefits that likely outweigh the incremental value to reliability offered by the limitations included in the PD.

The CAISO includes in its Local Capacity Technical Study certain resources under construction that are *expected* to satisfy their Commercial Operation Date (“COD”) by June 1 of the year being studied. Resources considered in the study must have executed regulatory agreements with the CAISO, such as the Large Generation Interconnection Agreement, Participating Generator Agreement, and Meter Services Agreement.

However, consistent with the PG&E recommendation, the CAISO emphasizes that for all months prior to the new resource becoming COD, the LSE must acquire sufficient local capacity to meet its local capacity requirement and include such capacity in its monthly Resource Adequacy Plan. In this way, PG&E’s proposal differs from the waiver of local obligations requested by San Diego Gas & Electric Company. Also, should the new resource not meet the expected COD, the LSE is again responsible for procuring replacement local capacity and including such capacity in its monthly Resource Adequacy Plan. By using the monthly Resource Adequacy Plans to fill in the “gaps” in yet-to-be operational local capacity listed on the year-ahead Resource Adequacy Plan, there exists a de facto true-up mechanism for local capacity that maintains each LSE’s local capacity obligation. The CAISO believes the foregoing represents a practical solution to allow new resources not COD by October 31<sup>st</sup> prior to the compliance year to count toward satisfying local capacity obligation in the year-ahead Resource Adequacy Plan, rather than restricting such new resources to only meeting system capacity requirements.

The CAISO acknowledges that the PD, as currently drafted, does more effectively minimize the likelihood of CAISO backstop procurement to address a “collective

deficiency” in the ability of the overall portfolio of LSE resources to satisfy Reliability Criteria. The need for CAISO backstop procurement may occur, for example, where the new resource fails to meet the expected COD and another resource is substituted for the new resource. If this substituted resource does not have the same or better effectiveness to address the identified contingencies that drive the local capacity obligation as that of the anticipated new resource and the CAISO cannot otherwise satisfy the Reliability Criteria, the CAISO would be compelled to procure additional capacity to address the collective deficiency. As noted, the CAISO believes the flexibility of PG&E’s proposal outweighs the risk of significant CAISO backstop capacity procurement resulting from its adoption.

## **II. Timing of Updates to CAISO NQC Report**

PG&E advocates that new resources should count toward meeting RA obligations once they are commercially operational, regardless of whether they are included in the CAISO’s NQC report. PG&E apparently reaches this recommendation based on the purported “infrequency” of updates to the NQC report. PG&E’s concern is incorrect and its recommendation should be ignored.

The CAISO’s NQC report is updated on a monthly basis. PG&E’s misperception may arise from the fact that changes in the NQC report do occur infrequently, but not because of a failure of the CAISO to update the list as necessary, but rather because few new resources become operational during the course of a calendar year. The CAISO includes the new resource in the NQC report following the COD and successful resource testing. For the same reasons the PD elected to rely on COD, the PD should continue to require a resource be included in the CAISO’s NQC report – i.e., that the resource is capable of providing the reliability benefits to the system for which it is being counted.

The CAISO understands the importance of accurate and timely updates to the NQC report and works very closely with the generator owners as they go through the interconnection process to ensure that they have met all interconnection requirements and are appropriately added to the NQC report as soon as the COD is met. The record does not demonstrate otherwise and no change to the PD in this regard is warranted.

Moreover, the CAISO objects to PG&E's implication that the NQC report constitutes guidance only. Changes in the use and effect of the NQC report by the Commission should occur only after close coordination between the Commission and CAISO and not as a result of party comments submitted for the first time in response to a PD that simply continues long-standing policy.

### **III. Coordination Between Proposal 8 and CAISO Possible Backstop**

As noted in the CAISO's opening comments, the CAISO supports, subject to specific clarification, the PD's adoption of the Proposal 8 procedure as a means to coordinate the Commission's RA process and the CAISO's backstop capacity procurement functions. PG&E expressed similar support and requested clarifications. However, PG&E also requested that the PD include a specific timeline to implement the coordinated processes. Included in PG&E's proposed timeline is a November 7 date on which the "CAISO notifies all LSEs of any collective deficiency to allow for additional LSE procurement." The inclusion of such date in the PD is unnecessary and would conflict with approved CAISO Tariff language that achieves the purpose sought by PG&E. Section 43.2.1.4.1 of the CAISO Tariff provides, in pertinent part, that the CAISO will issue a market notice no later than fifteen (15) days after the submission of the annual showings that identifies any deficient Local Capacity Areas, the quantity of capacity that would ensure compliance with Reliability Criteria, and, if appropriate, identify that specific resources that can resolve the violation of the Reliability Criteria.

Thus, the PD need not be revised to include a prescriptive schedule for CAISO communication with LSEs of identified deficiencies.

#### **IV. Clarification of “Dispatchable” QFs**

PG&E requests that the PD expand its ruling to apply the general thermal resource counting rules to dispatchable thermal QFs to other technology types to the extent QFs using the particular technology are also dispatchable. In other words, PG&E requests that the qualifying capacity of all dispatchable QFs be calculated in accordance with the counting rules applicable to their underlying technology. The CAISO agrees with PG&E’s requested expansion of the PD.

However, upon further reflection of this refinement to the counting rules for QFs, the CAISO recommends that the PD also clarify what is meant by dispatchable and, significantly, by whom. A resource should be considered dispatchable if it can respond to a Dispatch Instruction by the CAISO. A Dispatch Instruction is a request by the CAISO for an action with respect to a generator to increase or decrease its energy output to a specified operating point. It follows, therefore, that a QF that is primarily responsible for supplying power to its host industry or is restricted to operational changes dictated only by the purchasing utility should not be considered dispatchable. That said, the CAISO recognizes that not all dispatchable resources, such as hydro resources, are subject to CAISO offer obligations, but may nevertheless be able to respond to Dispatch Instructions. Accordingly, the CAISO suggests that the PD clarify that QFs will be subject to the counting rules of their underlying technology if they are obligated to respond to CAISO Dispatch Instructions as a result of execution of either a Participating Generator Agreement or QF Participating Generator Agreement.

**V. Conclusion**

The CAISO respectfully requests that the Commission consider the above reply comments and incorporate appropriately when adopting the Proposed Decision.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I hereby certify that I have served, by electronic and United States mail, the foregoing Reply Comments of the California Independent System Operator Corporation on Proposed Decision to each party in Docket No. R.08-01-025.

Executed on June 23, 2008, at Folsom, California.

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