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CAISO IRRP Team: The Large-scale Solar Association ("LSA") provides the following brief comments on the IRRP presentation, as requested during the January 13, 2007 kick-off call. These comments are brief because the very short turn around time did not permit the LSA to develop additional details. LSA would like an opportunity, at the appropriate time, to discuss its concerns and interests with the CAISO Team.

Comments

1) The IRRP study should explicitly determine and state the generation capabilities required on the system due to the potential retirement of existing fossil generation, particularly the existing "steamers", and the likely types of technologies that would provide physical substitutes for those resources. This is particularly important because the loss of the steamers due to age or regulatory compliance pressures (such as OTC, GHG, etc), should be understood distinctly from resource needs that may be driven by driven by different RPS build out assumptions. The IRRP should be clear on how incremental load growth would drive system generation capability requirements;

2) The IRRP study methodology discussed mentioned a simplified two-node model. While this could make sense as an initial structure, it does beg an important question. Specifically, the IRRP should anticipate not only potential changes within the CAISO system associated with the expansion of at 33% RPS requirement, but it should also note potential regional operational changes that may be driven by a increased role of renewables throughout WECC. Stated differently, the IRRP needs to recognize a larger backdrop of RPS mandates which may then trigger the need for new reliability-related ancillary services products; and,

3) The IRRP study should address how resource diversity, in terms not only of technology types but also location of development, impacts or drives system capability needs. Stated differently, it would be helpful to understand whether system resource needs are impacted by the timing and size of build-outs in particular locations (whether NP 15 or SP 15 or other areas) mitigates or exacerbates particular physical capability requirements when looked at in conjunction . This can then help in the understanding of how different RPS build-out scenarios or assumptions carry different physical requirements, as opposed to transmission-related requirements.

LSA may have additional issues to highlight at a later time. Looking forward to discussing LSA's concerns. ABB

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