

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

Order Instituting Rulemaking to Promote)
Policy and Program Coordination and)
Integration in Electric Utility Resource)
Planning)
_____)

R.04-04-003

**REPLY COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION ON THE RESOURCE ADEQUACY
PHASE 2 WORKSHOP REPORT**

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I. INTRODUCTION

Many of the comments had a common message – focus on elements of the resource adequacy requirement (“RAR”) that can be implemented for summer 2006. The California Independent System Operator Corporation’s (“CAISO”) opening comments also advocated such an approach and recommended that the Commission be pragmatic in developing a transitional RAR. Specifically, the CAISO stated that the local capacity obligation constitutes the single most vital factor in achieving RAR’s stated objectives in the near-term transition period, noting:

1. Units in load pockets are most at risk of being subject to bid mitigation in the CAISO’s energy and ancillary services markets and, therefore, are most in need of RAR’s “revenue stream” intended to replace that “missing from the capped energy markets so that physical generation remains economically viable to be available when and where required.”
2. The local capacity obligation is defined in a manner that builds toward the desired long-term capacity-based RAR.
3. The adoption of the CAISO’s local capacity obligation moderates the incompatibility of the Commission’s capacity-based RA end-state and any interim eligibility of certain existing contractual supply arrangements, e.g., “Firm LD” contracts.

No party contests the foregoing virtues. Nevertheless, several entities, including the Joint Parties and San Diego Gas & Electric Company, assert that implementation of a local capacity requirement should not be a component of the transitional RAR, but rather should be deferred until 2007. The CAISO strenuously disagrees. Boiled down, three justifications for the postponement are advanced: (1) the cost impacts of the CAISO’s local capacity requirement are uncertain, (2) the criteria applied by the CAISO is too stringent resulting in excess local capacity requirements, and (3) implementation

difficulties exist. None of these justifications have merit. In fact, if the Commission abandons the local capacity requirement as part of the June 2006 implementation elements, the Commission risks fatally undermining the CAISO's MRTU local market power mitigation procedures and the massive expansion of the CAISO's procurement role.¹ Neither of these outcomes is consistent with prior Commission policy or, more importantly, the interests of California consumers.

II. THE COMMISSION SHOULD IGNORE THE JOINT PARTIES' REQUEST TO POSTPONE IMPLEMENTATION OF LOCAL AREA CAPACITY REQUIREMENTS

A. The Local Capacity Requirement Does Not Impose Excessive Costs

The Workshop Report courageously and candidly admitted, “[a] resource adequacy system, one in which reliable service is secure and in which adequate investment continues to occur can be expected to be more costly than one which is not resource-adequate.” (Report at 20.) The Joint Parties do not directly challenge this reality, but rather assert the “boogey-man” of uncertain costs to insinuate that the CAISO's local capacity proposal imposes purported *excessive* costs.

The exercise of market power can lead to excessive or uncompetitive costs. However, the Joint Parties make no mention of the threat posed by the exercise of market power. Indeed, given the time needed to alter the physical characteristics of the grid by adding new infrastructure, the Joint Parties' request for postponement of the local capacity obligation to February 2007 will do nothing to alleviate any market power concerns. The CAISO has acknowledged that market power must be addressed under any near-term implementation schedule for local capacity and, because of these concerns, the CAISO set forth a solution in its opening comments: (1) the Commission must establish a basis for determining competitive capacity pricing and (2) the CAISO must receive the authority to enter into “backstop” local capacity contracts.²

¹ The Commission must fully consider the potential implications of adopting position of the Joint Parties and others. The Federal Energy Regulatory Commission (“FERC”) has expressed some frustration with the progress of the RAR development in California. If meaningful RAR that includes compensation for local resources is further delayed, a very real risk exists that FERC reject the local market power mitigation provisions in MRTU. Instead, FERC may implement a method of scarcity pricing because the Commission does not adopt an effective local capacity obligation that provides sufficient revenues to the capacity necessary to meet planning and operating standards.

² In this regard, the Joint Parties state they are concerned about the “number of “local reliability areas,” yet fail to define why this is a “concern.” As noted, the threat of market power exists in both larger local geographic regions as well as smaller regions. The Commission, along with the CAISO, should affirmatively address this threat as noted above. It should not provide differential treatment of these areas by rejecting the uniform application of the CAISO's local capacity criteria. The CAISO has found that the transmission network in these smaller areas, as well as the larger local capacity areas, is insufficient to meet NERC/WECC/ISO planning and operating requirements without local generation. Moreover, the introduction of transmission improvements or effective dispatchable demand response will reduce the need to procure generation in these pockets over time.

Nor can the Joint Parties credibly repeat that certain operational costs impose excessive costs. A criticism leveled by the Joint Parties against the top-down approach was that it would result in increased operational costs because units would have to make themselves available during times when they were not needed. Not only is this point erroneous as applied to the top-down approach, it is clearly irrelevant in the context of local capacity. The Joint Parties, and all other parties, agree that local capacity must be available during all hours that it is physically capable of operating.

Finally, if the CAISO has appropriately identified the capacity requirements needed to operate the system in accordance with applicable planning and operating standards, then it follows that the capacity is “needed” to serve California consumers and the cost of securing the capacity by definition cannot be excessive. Thus, there is no uncertainty or need to assess the costs. Rather, the Joint Parties’ allegation of uncertain costs is resolved by verifying that the CAISO criteria for determining local capacity are appropriate.

Prior to directly demonstrating that the CAISO’s criteria are wholly consistent with its planning and operating standards, however, the CAISO responds to the Joint Parties reference that “the CAISO’s operational needs has driven the reserve margin to over 30 percent in some cases.” (JP at 4.) First, the CAISO’s preliminary study showed local requirements in Fresno and Sierra that were not accurate. The Fresno area information was incorrectly reported by reflecting the sum of the sub-area requirements, rather than the entire local area requirement. As a result of the overlapping of the sub-areas, this represented double-counting of the MWs required for the entire Fresno area. Also, the preliminary report presented results for the Sierra area that accurately reflected generation requirements, but failed to include all load within the pocket. The CAISO reviewed its preliminary report with stakeholders for the purpose of refining and improving its analysis, and the CAISO’s final report, which it intends to submit to the Commission on or about July 29, 2005, will reflect these corrections. Second, even if a local area did require a 30% planning reserve margin to satisfy the applicable and appropriate planning and operating criteria, no excessive costs would be imposed. This is not only because the units would necessarily be needed, as discussed above, but also because the capacity procured locally counts toward the LSE’s aggregate obligation. Simply put, the LSE’s overall obligation will not exceed an aggregate 15% planning reserve margin of load even if in some locations the requirement will exceed this percentage. Again, absent market power, under a capacity-based RA, the cost of such local RA should not be materially different than capacity available outside the load pocket.

In summary, while program costs should always be considered in development of a regulatory framework, any economic evaluation is based on the premise that there are at least two options to consider that are acceptable solutions. However, the local capacity assessment utilizes the NERC/WECC/CAISO planning and operating requirements to establish the minimum local capacity that must exist within the defined load pocket. Without this quantity of capacity, the CAISO fails to meet the NERC/WECC/CAISO planning and operating requirements. Any economic evaluation would therefore be

requesting that the Commission knowingly ignore such standards. Given that the RAR is fundamentally about ensuring revenue adequacy of needed generating capacity, the result of the local capacity analysis is to identify only that capacity that should be compensated to ensure their continued availability.

B. The CAISO's Local Capacity Requirement Criteria Comport With Planning and Operating Standards

The Joint Parties claim that the local capacity criteria is in excess of established grid-planning standards. This claim is incorrect and the Commission should reject any such suggestion. The ISO has consistently conveyed to stakeholders that the local criteria are consistent with the NERC/WECC/ ISO planning standards. The CAISO's technical analysis to establish local capacity requirements applies criteria that include BOTH planning and operating criterion in a manner consistent with NERC/WECC standards. The CAISO described the operational impacts if certain contingencies were not accounted for in the local area analysis. The purpose of the local area capacity requirement is intended to define the quantity of capacity necessary to support real-time operations. Indeed, the report appears to recognize that the reliability goals underlying the RAR must be addressed by stating, "[t]here must be enough resources to meet customer needs (adequacy) and enough of that capacity must be available when it is required (security)." (Report at 19.)

In particular, the Joint Parties state that "the CAISO has included operating requirements for contingencies that go beyond NERC performance Level C standards for large local areas like the LA Basin." (Joint Parties at 7.) Current NERC/WECC planning criteria allow for load shedding under such a contingency and would not mandate construction of new transmission infrastructure. However, NERC/WECC operating criteria require that after the loss of a single element the system operator must readjust and prepare for the next major contingency. As a result, the system operator must have additional infrastructure available, otherwise it will be forced to curtail load prior to the contingency. It should be noted that only one of eleven identified load pockets is affected by the operating criterion. Specifically, for the Los Angeles Basin South of Lugo, the operating criteria considers the impact on load in southern California after the loss of one line and the potential loss of two additional 500kV lines. As the CAISO previously emphasized, if the foregoing contingency was left unaddressed, it would have a major, long-term major impact on the ability to serve load because on the size of the MWs affected and the potential length of time to reconstruct the transmission system in the event such conditions occur. Yet, even with this conservative criterion, sufficient capacity exists in the eastern Los Angeles Basin to meet the requirements and therefore no new capacity is required to be constructed.

The Joint Parties also assert that the "CAISO proposal explicitly prohibits any form of demand response, including load shedding, to address a reliability concern even if such demand solution is permitted under NERC/WECC/CAISO criteria." (Joint Parties at 7.) This fails to acknowledge that there are numerous existing load shedding special protection schemes explicitly incorporated into the CAISO's local capacity requirements

study that do address reliability concerns. Only for particular contingencies that are not addressed by SPS and manual shedding is too slow to satisfy the CAISO's planning and operating criteria has the study identified a local capacity obligation.

Moreover, PG&E states that the "CAISO's Local Capacity Study Methodology and Criteria ... contains at least one major flaw," and recommends that "the Local Area RA requirements may be determined using only approved CAISO Grid Planning Standards". What PG&E fails to say is that, the "one major flaw" that PG&E refers to in the Local Capacity Study Methodology is the same basic methodology the CAISO has used to perform RMR studies over the last 7 years. Generation in load pockets has market power and may economically withhold their capacity from the market or retire. Because of this problem, in the RMR technical studies, the CAISO assumes that local generation that does not have an RMR contract or other contractual obligation to run is off-line. The CAISO has continued this methodology in the local capacity requirement studies. The approach is even more justifiable because the major premise of the local capacity requirement studies is that the must-offer will be rescinded by FERC. PG&E's statement "(s)uch a combination of prior, critical generators outages and multiple contingencies fall within the category of extreme contingencies (Category D) in NERC/WECC Planning Standards, for which mitigation is not required and within the CAISO's Grid Planning Standards" is false." First of all PG&E characterizes the off-line generators as "generators outages". As stated above, the generators are assumed to be economically withholding or retired, not physically in a failed state. In addition, the NERC/WECC Planning Standards focus on physical equipment failures and do not consider economic withholding or retirement as Category B, C, or D contingencies. Therefore, PG&E's claim that the ISO is determining local capacity requirements based on Category D contingencies for which NERC/WECC do not require mitigation, is also false.

Thus, PG&E and others are trying to mislead the Commission into believing that the results are "excessively conservative" when in reality the CAISO is only attempting to incrementally build upon existing methodologies to ensure that they are consistent with NERC/WECC planning and operating standards, the very standards that PG&E is promoting.

C. The Purported "Critical Implementation Issues" Should Not Delay the Effective Date of the Local Capacity Requirements

The Joint Parties also attempt to justify deferral of the local capacity requirement by raising, but not attempting to answer or otherwise offer solutions, to various questions. The CAISO provides answers to those questions as follows:

- *What does it mean to have generation-deficient local areas?*

In order to meet the proposed locational capacity criteria, new transmission expansion projects or generation projects are needed in some local areas. The CAISO's preliminary analysis identified three areas where the existing capacity is deficient to meet

the local capacity requirement. This situation - which can be described as a failure to meet planning criteria - can arise because of the temporal nature of transmission additions. Specifically, under the CAISO's grid planning process, if a planning criteria violation or potential violation is identified, the CAISO and PTOs develop a transmission solution and implement this solution as quickly as possible. Thus, the local capacity requirement provides significant market information reflecting an opportunity for generation and transmission developers to advance alternative solutions to infrastructure deficiency.

• If all the generation in the local area is unavailable because it is under contract to or owned by other entities, what can LSEs do to meet the local RAR?

It should initially be noted that the Joint Parties raise this issue as a hypothetical situation. There has been no evidence to suggest that this will be a significant problem. Nevertheless, it is conceivable that sufficient wholly unencumbered generation may not exist within the local area because of prior commercial arrangements with LSEs who are not subject to Commission jurisdiction. If this is the case, the LSEs should be instructed to seek an arrangement that requires the capacity to offer itself into the CAISO markets when not dispatched pursuant to an export schedule. The essential provision of the arrangement is to allow the CAISO to instruct the unit to operate at specified levels without regard for the entity that contractually takes delivery of the energy. This would maximize the CAISO's access to the locational capacity it needs to meet operating requirements.

• If the guiding principle was to make the local areas as large as possible to avoid potential market power of generators, why are two of the local areas tiny "dots" on the CAISO's map?

The CAISO's preliminary report identified two areas that contain only one generating unit each. Upon further evaluation, both of these areas are covered by the standard grid planning criteria even with the typical simplifying assumption that all facilities are competitively participating in the market. Therefore, the CAISO in its revised report intends to remove both local areas from consideration because they are incorporated in larger load pockets.

• If the local areas are large, then there may be differences in the effectiveness of the generating units in resolving potential local area problems. How would the LSE know for sure that it has contracted the right generating unit(s) so that the CAISO does not have to procure additional resources later?

The CAISO will provide in its Final Report information identifying certain generators within sub-areas that must be under contract to meet the requirements within the larger area. Once all of the area and sub-area requirements are met the need for the CAISO to procure additional resource later should be minimal.

• How are the transmission constraints reviewed and addressed in a coordinated manner between the resource adequacy and transmission planning process?

The CAISO plans to perform a locational capacity requirement study based on anticipated 2010 system conditions. This assessment also will include a determination of the transmission facilities needed to substantially reduce or eliminate the locational capacity requirement. The CAISO will propose that these transmission projects be constructed unless lower cost alternatives are available. Equally important, while the coordination between RA and transmission planning is essential, the fact that all details of this coordination process may not be finalized should not delay implementation of the 2006 local capacity requirement.

• How is the local RAR implemented before MRTU is operational?

Three alternatives were offered in the Local Capacity Procurement paper posted at the following link: <http://www.caiso.com/docs/2005/06/24/2005062408475316895.pdf> Based on the discussions thus far with operations management, the ideal alternative appears to be a combination of the second and the third alternatives. With this combination, (i) the CAISO would continue to pre-dispatch any units that remain under an RMR Agreement using the existing process and systems; (ii) the CAISO would review local needs that would require commitment of any units with start-up lead times requiring commitment in the near Day-Ahead final scheduling time-frame and commit these units using the current Must-Offer Waiver process; (iii) the CAISO would evaluate the dispatch level of units in the final Day-Ahead schedules to determine dispatch amounts to increment or decrement; (iv) the CAISO would communicate the incremental dispatches through the Must-Offer Waiver process in time for the LSEs to include the dispatch amounts in their final Hour-Ahead schedules. All dispatch amounts would be included in the RTMA dispatch notices. The CAISO Tariff would be revised to provide the authority to implement the process as described.

• Is it reasonable to have a local RAR that exceeds 130% of peak load for the local area such as is the case in the Fresno and Sierra local areas, per the CAISO's preliminary Local Capacity Study?

The preliminary study showed local requirements in Sierra that exceeded the local area load. The Fresno area information was incorrectly reported by reflecting the sum of the sub-area requirements, rather than the entire local area requirement. Because of the overlapping of the sub-areas, there was double counting of the MWs that are required for the Fresno area. In addition, the report presented results for the Sierra area that accurately reflected generation requirements, but failed to include all load within the pocket. The revised report will reflect these corrections.

• Do the LSEs have to meet the sub-area requirements as well or only for the Eagle Rock/Fulton Pocket?

All sub-area requirements that are identified in the CAISO's Local Capacity analysis should be met to ensure reliability. The Local Capacity requirement for Eagle Rock/Fulton pocket can be counted toward fulfilling the requirement of the Lakeville pocket.

• How do LSEs fit the required renewable purchases to meet the RPS into their portfolios, when also obligated to meet the local RAR?

This question appears to be designed to be inflammatory, rather than constructive. Again, the CAISO's methodology is reasonable because it is applying the NERC/WECC/CAISO planning and operating standards. Thus, the local capacity in the designated quantities and with the appropriate operating characteristics is required to reliably operate the grid. More importantly, contrary to the insinuation of the Joint Parties, the local capacity obligation will not somehow crowd out renewables. Local capacity requirements do not account for an LSE's entire capacity obligation. Local capacity is approximately 59% of a 1 in 10 peak load for the CAISO Control Area. In reality, the percentage is lower than that for a 1 in 2 peak load forecast for the whole system. The CAISO's Summer Assessment forecasted the summer 1 in 2 peak for the CAISO Control Area to be 46,668 MW, not counting any operating reserves. With the RA planning reserve margin, the total RA obligation under such load conditions would be 53,668 MW ($46,668(.15) + 46,668$). The percentage is approximately 47%. Thus, LSEs are only meeting 47% of the RAR and have the ability to meet the remaining 53% of this obligation through renewables, imports, and additional capacity inside or outside the load pockets. Clearly, LSEs will continue to have room in their portfolios for renewable capacity. Moreover, given that imports will remain an energy product under the transitional RA period, no cost burden will be imposed on an LSE for using renewable capacity, rather than imports, during winter months when the RA obligation is reduced. In other words, imports remain valuable as energy to meet load without the need to count toward RA because they allow for economy purchases when energy prices are low and generally only reflect marginal, variable operating costs.

• How can demand response be used to meet the local RAR, considering utilities are allowed by NERC, WECC, and CAISO rules to use load shedding to meet certain planning criteria?

This question combines two types of load products. DR has been defined as dispatchable load that meets the RA counting rules, while the CAISO interprets load shedding as involuntary interruption of service to customers to avoid a greater system impact.

Demand response that can be demonstrated to be effective and is controllable by the CAISO may be counted towards the local requirements. Load Shedding should only be considered to the extent such procedures or RAS/SPS mechanisms can be in place to shed load solely during events that allow load shedding per NERC/WECC/CAISO

planning and operating criteria. Any such mechanisms that can be in place prior to the period of need will be incorporated as a reduced Local Capacity requirement as compared to the requirement studies produce in the absence of such RAS/SPS.

III. THE COMMISSION SHOULD NOT ADOPT THE BOTTOM-UP APPROACH ABSENT MODIFICATIONS TO THE PROPOSED METHODOLOGY

The Commission must not adopt the bottom-up (“BU”) proposal as currently proposed by the Joint Parties. Without additional modifications or refinements, the BU approach in the absence of the FERC must-offer requirement may threaten grid reliability. The CAISO has consistently pointed to three issues that must be addressed.

First, the Joint Parties assert that the BU will ensure sufficient resources are being procured to provide a 15% margin for each hour of the monthly load duration curve. However, there are many hours near the top of this curve that occur on “off-peak” days. Accordingly, such time period would be identified on the BU LSE load duration curve as likely being satisfied by a peaking resource, i.e., 6 x 16 or 5 x 8. Yet, due to contractual limitations, the resource would not, in fact, be available to the corresponding point on the load duration curve. Thus, the CAISO has strongly advocated that an off-peak BU analysis must be implemented as a precondition to the CAISO’s support of a BU approach. At this time, the Joint Parties have not committed to, nor have they developed, a proposed off-peak curve.

Second, the Joint Parties have not specified which hours the standard products would be made available to the CAISO. Without greater specificity, LSEs may reflect that they have procured resources that are available for an appropriate number of hours, but these hours may not correspond to the hours that the CAISO most needs the resources. For example: because the BU approach is driven by contractual, rather than physical, resource limitations, an 8-hour product could begin and end on whatever hours the LSE may choose. However, the CAISO needs these very limited resources during the peak hours of the operating day. The Commission should not adopt the BU proposal without explicitly requiring that the Joint Parties work with the CAISO to define a limited set hours for such limited resources, which will provide the CAISO operators the visibility necessary to reliably operate the grid.

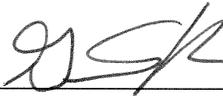
Third, if the Commission does elect to divide the compliance obligations between LSEs and suppliers, with the CAISO having a primary role in supplier compliance, then there must be some standard product durations so the CAISO does not need to interpret a myriad of differing contract conditions. The Joint Parties and other LSEs appear to prefer the BU framework because it conforms to their procurement activities. However, the Commission is well aware that this will result in a wide variety of outcomes based on differing contract provisions relating to specific notice periods, limited run times, or other triggering provisions. The CAISO has consistently shared with the workshop participants and this Commission that it cannot be put in the position of interpreting a large quantity

of contracts with varying provisions.³ Without these protections, the Joint Parties' claim that the BU approach provides assurance of sufficient resources, including energy, in all hours is undermined.

The CAISO notes, as it has in other prior comments, the BU approach may provide an adequate interim or transitional mechanism, but it is inherently incompatible with a long-term capacity-based RA paradigm. As the Report indicates, the purpose of an effective RAR is to ensure revenue adequacy for the sufficient amount of capacity to be available over the long-term planning horizon. Most notably, California needs every megawatt of existing capacity and the failure to compensate generator owners adequately creates the potential for the retirement of critical assets. Accordingly, the Commission should reiterate – regardless of whether it adopts the BU or TD for the transition - its vision of a capacity-based RAR.

July 25, 2005

Respectfully Submitted:

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³ A compliance approach that assigns all responsibility to the LSE and performs an after-the-fact assessment would not necessarily require specific product durations. Under the LSE centric approach, the CAISO would simply measure that the LSE for every hour could account for its load plus the planning reserve margin

CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic and United States mail, a copy of the foregoing Reply Comments of the California Independent System Operator Corporation on the Resource Adequacy Phase 2 Workshop Report to each party in Docket No. R.04-04-003.

Executed on July 25, 2005, at Folsom, California.



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