

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

Order Instituting Rulemaking to Promote)	
Policy and Program Coordination and)	R.04-04-003
Integration in Electric Utility Resource)	
Planning)	
_____)	

**REPLY COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
ON ASSIGNED COMMISSIONER'S RULING REGARDING RELIABILITY ISSUES**

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Dated: June 21, 2004

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Pursuant to the Chief Administrative Law Judge’s Ruling Regarding Reply Comments on Reliability Issues, dated June 17, 2004, the California Independent System Operator Corporation (“CAISO”) respectfully submits these reply comments with respect to the Assigned Commissioner’s Ruling Regarding Reliability Issues mailed in this proceeding on June 10, 2004 (“ACR”).

I. Introduction

The CAISO applauds the California Public Utilities Commission (“Commission”) for assisting the CAISO in addressing known and understood system conditions that adversely impact the CAISO’s ability to maintain a reliable transmission system. Specifically, the ACR proactively proposes interim measures to correct an adverse consequence arising from the manner in Load Serving Entities (“LSEs”) are implementing the Commission’s existing “least-cost” procurement directive. As acknowledged by Southern California Edison Company (“SCE”) in its comments, LSE procurement is focused on procuring sufficient aggregate resources to serve aggregate load at least cost. (SCE Comments at 5.) This focus on LSE-specific total energy requirements to the exclusion of CAISO reliability needs has forced the

CAISO to redispatch large volumes of energy in real-time to account for forward schedules that are undeliverable or fail to satisfy other operating requirement. The excessive daily volume of real-time redispatch complicates the CAISO's efforts to maintain system reliability.

The CAISO strongly commends President Peevey and Commission staff for expeditiously issuing the ACR to address the ongoing reliability concerns confronted by the CAISO. The CAISO believes the ACR is appropriately focused on identifying the procurement and scheduling practices necessary for the IOUs to effectively serve their load while not compromising grid reliability. Moreover, the ACR appropriately provides the IOUs with assurances that any costs associated with such reliability-enhanced procurement practices will be recoverable from their customers. In this way, the ACR serves to immediately improve reliability by mitigating the excessive volume of real-time dispatch now experienced by CAISO staff.

The CAISO further supports the ACR's explicit premise that this issue is a short-term problem (summer 2004 through summer 2005) and is anticipated to be substantially corrected by the introduction of the Commission's Resources Adequacy provisions in summer 2006, including deliverability requirements, and the CAISO's implementation of its Market Design 2002 ("MD02") proposal. All of the comments agree that MD02 will move the redispatch of infeasible schedules to the day-ahead time frame and substantially address the reliability issues identified by the CAISO.

The IOUs also acknowledge and support the Commission's commitment to addressing grid reliability issues. However, the IOUs question the approach taken by the ACR by asserting that the ACR constitutes a fundamental paradigm shift in grid operations by transferring responsibility for reliability from the CAISO to the IOUs. The CAISO disagrees and believes the IOUs misapprehend the intended scope and significance of the ACR. The CAISO acknowledges

that it is responsible for the short-term reliability of the grid. The Commission has previously represented that the IOUs should be responsible for procuring the resources to reliably serve their load, i.e., the long-term reliability of the system. The CAISO views the ACR as an attempt to align those two functions. That is, the IOUs should procure and schedule resources in a manner consistent with the CAISO's established and existing reliability and operating requirements. Thus, as opposed to the "paradigm shift" alluded to by Southern California Edison ("SCE") and Pacific Gas & Electric Company (PG&E"), the CAISO views the ACR as consistent with the spirit and intent of the Commission's existing short-term procurement rules.

In addition, the ACR is clearly not designed to supplant or supersede the Commission's ongoing development of resource adequacy requirements or comprehensive long-term procurement plans. Rather, the ACR recognizes that something must be done NOW as an interim measure until resource adequacy and the long-term procurement plans are in place. SCE itself acknowledges that the ACR should be seen as "transitional, until [the CAISO's] MD02 takes effect." Indeed, the CAISO has recently proposed to accelerate to Summer 2005 deployment of certain elements of the MD02 design to address critical operational issues such as intra-zonal congestion.¹

The implication of the ACR's narrow intent is that its implementation cannot involve substantial and complicated rule changes that defy prompt application. Political columnist George G. Will said, "[t]he pursuit of perfection often impedes improvement." The IOUs appear to be interpreting the ACR as demanding perfection in IOU management of resources for reliability purposes and, in so doing, will likely obstruct progress in improving grid reliability in the short term. The Commission through the ACR, in contrast, seeks incremental improvement

in IOU scheduling practices, not perfection. By clarifying the ability of the IOUs to recover reliability related costs, the ACR is seeking to encourage the IOUs to do the right thing without fear of not being able to recover their costs.

In fact the Commission has already established that the LSEs are responsible for planning and procuring resources to serve their load. The ACR makes clear that reliable service to an LSE load may require specific resources to meet local area reliability. Given California's limited and oftentimes constrained transmission network, in order for an LSE to meet its statutory obligation to serve load it is necessary that an LSE consider whether such resources can feasibly be delivered.

Further, the Commission through D.04-01-050, the Peevey/ Geesman Joint Statement, issued at the prehearing conference in this proceeding, and ACR memo have stated that each LSE is expected to consider load pockets in their resource planning and procurement activities. This responsibility will ensure LSEs attempt to define their resource needs on a locational basis thus ensuring that procured resources either exist within the defined load pocket or are deliverable to the load.

Several issues are raised by the foregoing discussion. First, if the point is to impose a rapid, but narrow, solution, why does the CAISO prefer the ACR to pursuing additional Reliability Must-Run ("RMR") contracts? Second, again, if the goal is to adopt a narrow solution, should the ACR be initially directed to SCE or Southern California where the most severe problems are occurring? Third, if the IOUs are to procure locally to improve system reliability, what information will be provided by the CAISO to facilitate their procurement?

¹ See, "Interim Proposal for Day Ahead Management of Intra-Zonal Congestion," CAISO (June 18, 2004), <http://www.caiso.com/docs/09003a6080/31/87/09003a6080318791.pdf> ("Interim Proposal").

Fourth, will the dissemination of this information exacerbate local market power concerns? The CAISO addresses each of these questions below.

II. RMR Contracts Represent an Inferior Tool

Whether a proposed solution will be effective depends on the problem or problems to be solved. The various parties' contention that additional RMR contracts can serve as a substitute for the approach outlined in the ACR rests on an erroneous assumption that RMR can be used to addressing all reliability requirements and congestion.

Relying on RMR Generation has significant limitations. The RMR contract was constructed to limit the ISO's ability to call on service from RMR units so as to prevent the CAISO from influencing market prices by taking unneeded service at the cost-based RMR rate. First, the CAISO may only dispatch Energy under the RMR contract to maintain "local" reliability and to manage intra-zonal congestion, and only then when market bids cannot be used in merit order to meet the local reliability need or manage intra-zonal congestion. Next, the CAISO is expressly prohibited from dispatching Energy under the RMR Contract to manage inter-zonal congestion or to meet general imbalance energy requirements. The CAISO may direct RMR units to provide Ancillary Services, but only if the CAISO has first used all available Day-Ahead Ancillary Service bids and the Hour-Ahead market provides less than twice the Ancillary Services the CAISO requires. Finally, the CAISO does not have authority to reduce or limit a unit's output under the RMR Contract – a key functionality when managing congestion. As a result, RMR Contracts should be used in very specific circumstances where the CAISO requires a particular unit to meet a local need, not as a general portfolio tool to address deliverability issues that may go beyond local reliability problems. Therefore, the CAISO supports the Commission's directives that LSEs include local reliability as a component of their

procurement practices, which in turn will “increase the effectiveness of resource procurement and result in lower costs to rate payers.”²

III. SCE’s Scheduling Proposal Cannot Be Implemented in the Timeframe Needed to Meet the Goals of the ACR

The CAISO recognizes the need and potential benefits of incremental improvements to the current set of CAISO tools. The CAISO is currently evaluating the feasibility of managing intra-zonal congestion in the Day-Ahead time frame.³ One option the CAISO is considering is a post Day-Ahead re-dispatch process similar to what SCE proposes in its comments. SCE’s proposal, however, calls for the CAISO to test the feasibility of final Day-Ahead schedules using existing evaluation tools and decision criteria to determine whether resources’ Final Day-Ahead schedules need to be re-dispatched.

The CAISO’s current congestion management system only considers network constraints between congestion zones and does not consider constraints within congestion zones. Further, the CAISO’s existing tools do not indicate how to adjust Final Day-Ahead schedules in the most effective, least-cost way to eliminate all congestion, including congestion within existing zones. However, it must be noted that the software and new rules proposed under the CAISO’s MD02 market redesign are designed to do these things. Therefore, the ISO is evaluating an interim solution until MD02 is fully implemented that would use a network model that considers more network constraints. To either modify the existing zonal congestion management model to consider all constraints, or to implement a new tool outside the current market process that would

² “We direct the utilities to include a local reliability component in their next procurement plan. This approach will facilitate a more comprehensive approach to resource planning. It is our intent that this approach will increase the effectiveness of resource procurement and result in lower costs to ratepayers.” (D.04-10-050, mimeo. at 129.)

³ Interim Proposal.

consider all constraints (both of which options are being evaluated) would require significant software modifications that the CAISO expects would take several months to properly design, develop, test and implement. As SCE notes, relaxing the current market separation requirement, which mandates each Scheduling Coordinator's portfolio remain balanced (i.e., to have energy supply equal energy demand), would increase the "pool" of resources available to be re-dispatched to manage intra-zonal congestion, but would also increase the scope of system changes required. In summary, while the CAISO is examining an approach to manage intra-zonal congestion prior to real-time similar to what SCE has proposed, deploying the tools needed to implement such a comprehensive system will require software modifications that cannot be responsibly implemented in 2004.

IV. Potential Limitation of the ACR to SCE Only

PG&E, in particular, notes that the ACR is primarily concerned with problems arising in Southern California. It is true that the problems described in the CAISO's June 10, 2004 letter, upon which the ACR relies, are predominantly occurring in Southern California and are not imposing similar burdens on CAISO operations with regard to Northern California. Accordingly, a legitimate question arises whether the ACR should be focused in the short-term on SCE and only expanded to encompass other LSEs if it is subsequently determined that real-time operations are similarly burdened by the submission of infeasible forward schedules. While the CAISO believes it is appropriate to ask the question, it also believes the question must be answered negatively.

Several factors militate in favor of adoption of a generally applicable rule. First, and most importantly, an objective established by the Commission for this proceeding is to resuscitate the IOUs obligation to serve their customers. The Commission has recognized that a

component of satisfying the obligation to serve is that resources procured by the LSE be deliverable to its load.⁴ Accordingly, as stated in the ACR, “it is reasonable for utilities to schedule resources so as to not increase known or reasonably anticipated congestion on the transmission system and to schedule such resources consistent with established and identified reliability requirements.” (ACR at 2.) This statement applies with equal force to all LSEs, not just SCE. Second, while the CAISO is not presently observing the same level of curtailment of forward schedules submitted by PG&E or SDG&E, it would be inaccurate to say, however, that congestion concerns are limited to SCE’s former service territory. The chronic congestion at the Miguel Substation in San Diego County is well documented. Moreover, anticipated patterns of generation additions and transmission upgrades, as well as current constraints, suggest that approximately 32 areas of problematic congestion may exist on the grid in the near future, including some areas in Northern California. Thus, a generally applicable rule is appropriate to provide the Commission flexibility to address any future situation that may arise from the unwillingness of an LSE to alter its forward scheduling practices to account for such congestion.

IV. The Potential Cost-Shifting Impact of the ACR Is Not Inequitable Under the Circumstances

SCE notes IOU power procurement is, by definition under the pre-existing framework, focused on procuring sufficient aggregate resources to serve their aggregate load and reserve requirements at least cost. SCE then complains that the ACR modifies the existing framework by assigning additional responsibility for grid reliability on IOUs and thereby force IOUs to incur reliability related costs on behalf of ESPs, community choice aggregators, and municipal entities. (SCE Comments at 5.) The CAISO appreciates this Commission’s traditional approval of cost-causation principles and its sensitivity to cost-shift implications of its regulatory actions. In this

⁴ See, D.04-01-050, mimeo. at 51-53.

case, the ACR promotes cost-causation principles and will unlikely result in a material, if any, cost-shift burden on the IOUs.

The allegation that substantial imbalances in cost responsibility may result from the ACR arises, in large part, from the misunderstanding as to the scope and intent of the ACR. As noted, the ACR is not intended to transfer grid responsibility from the CAISO to LSEs, but rather to reassure LSEs that deviation from least-cost procurement is permitted to enhance the feasibility of the LSEs forward scheduling practices. The CAISO does not view the ACR as imposing a mandatory locational procurement requirement. Simply put, the goal is to remove a perceived disincentive to scheduling resources in a manner more consistent with the CAISO's operating requirements. When put in this perspective, and with respect to SCE in particular, it is clear that IOU ratepayers will not be saddled with an undue financial burden.

To begin, the ACR and earlier Commission order clarify that "reliability" constitutes a primary consideration in procurement decisions. This is consistent with the Commission's inclusion of a deliverability requirement as a component of the IOUs obligation to serve their load. Consequently, potential costs incurred by SCE or any LSE to procure resources that enhance the overall deliverability of its portfolio is appropriately a consequence of its obligation to meet the needs of its native load. The issue is, therefore, not one of cost-shifting, but cost recovery to which the ACR is committed. Moreover, to the extent an LSE submits an infeasible schedule in the day-ahead timeframe with the expectation that its load will be met through real-time dispatch by the CAISO, that LSE is spreading costs to other LSEs. Under the CAISO's current Tariff provisions, real-time redispatch costs are allocated to all load within the zone in which the dispatch occurs and not solely to the scheduling coordinator whose resources were redispatched. Thus, although the CAISO has not quantified the impact of SCE's scheduling

practices, for example, it is evident that those entities that submit infeasible schedules impose costs on other LSEs located within the same congestion zone.

VI. CAISO Agrees to Provide Supplemental Information and the Implications for Local Market Power

SCE expressed concern that the ACR may increase the ability of generators to exercise locational market power in two ways: first, by providing them with additional information on specific reliability requirements which require that specific generating units or groups or groups of units be in operation during certain conditions; and second by requiring that IOUs procure supplies from specific units or groups of units.

The CAISO agrees with both of these areas of concern, but believes the ACR may be implemented in a way that mitigates these concerns. With respect to market power concerns relating to the release of information to all market participants, the CAISO notes that substantial information may be released in a format or level of aggregation which substantially increases the ability of LSEs to incorporate local reliability in procurement decisions, while providing limited additional information which may be used by generators to exercise locational market power. The CAISO stands ready work with the LSEs and other parties to identify information that may released publicly, and has already begun reviewing the types of information initially identified as having potential value in terms increasing the ability of LSEs to incorporate local reliability in procurement decisions.

The CAISO agrees that to the extent that LSEs are ordered to acquire power bilaterally from sellers possessing local market power, consumers could be exposed to excessive rates. As long as LSE's are not "required" to procure locationally but are instead "encouraged" to pursue locational capacity, the market power concerns are mitigated. If generators know that absent

doing a forward deal with the utility, they will be denied a must-offer waiver (cost-based commitment compensation), dispatched in real-time by the ISO, and subject to local market power mitigation then they will have an incentive to offer the utility a reasonable forward purchase arrangement. Thus, the CAISO notes that over the short term, LSEs should be allowed to manage procurement in a way that better meets reliability requirements, but should not be required to meet all such needs at any price. With this approach, market power mitigation mechanisms already in place under the CAISO's FERC-approved a tariff (such as the ability to sign RMR contracts, the Must-Offer process, and real time bid and price mitigation) can continue to serve as a backstop or cap on locational market power.

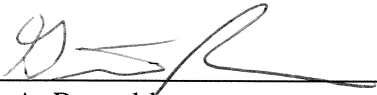
The CAISO also notes that over the longer term, opportunities for factoring reliability needs into procurement decision may be greater, as the range of competitiveness of supply options is typically greater for longer term procurement decisions. In addition, benchmarks for assessing the reasonableness of any premium for supply that meets locational reliability needs – such the cost of RMR Condition 2 contracts – are more applicable for longer term contracts over one year or greater in duration, but cannot be applied to short-term purchases such as hourly, daily or monthly.

VII. Conclusion

For the foregoing reasons, the CAISO supports the ACR and the ultimate adoption by the Commission of a decision embodying the principles set forth in the ACR.

June 21, 2004

Respectfully Submitted:

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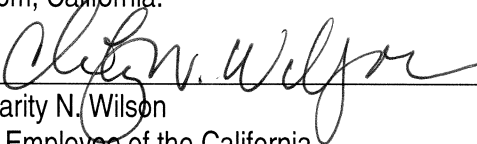
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CERTIFICATE OF SERVICE

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 Assigned Commissioner's Ruling Regarding Reliability Issues to each party in Docket No. R.04-04-003.

Executed on June 21, 2004, at Folsom, California.



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