

**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 DRAFT DECISION OF ALJ WETZELL REGARDING INTERIM OPINION ON  
RESOURCE ADEQUACY**

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Dated: September 27, 2004

In accordance with Rule 77.5 of the Commission's Rules of Practice and Procedure, the California Independent System Operator Corporation ("CAISO") respectfully submits its reply comments on Administrative Law Judge ("ALJ") Wetzell's August 31, 2004 draft decision regarding resource adequacy ("Draft Decision").

**I. The Development of Local Capacity Requirements Should Not Prevent Compliance with the Commission's July 8<sup>th</sup> Order on Reliability Issues**

SCE recommends that "[t]he Commission [] incorporate the procurement objectives of D.04-07-028 into the deliberations prescribed in the [Draft Decision] to address local area reliability and apply a uniform set of obligation [sic] on all LSEs." (SCE Opening Comments at p. 6.) By this recommendation, SCE essentially seeks to stay any requirement that it comply with the Commission's directive in Resolution E-3888 to develop and file a procurement advice letter in accordance with D.04-07-028. The Commission should not modify the Draft Decision in this regard. Simply put, the development of long-term local capacity requirements in the context of resource adequacy does not provide a basis for relieving LSE obligations to comply with the "interim" provisions of D.04-07-028.

SCE argues that "the issues confronting SCE, which would have to be overcome before SCE could deliver the required procurement advice letter, are the very same issues the [Draft Decision] recognizes cannot be adequately addressed until multiple 'future proceedings' are concluded in 2006." (SCE Opening Comments at p. 6.) While the CAISO acknowledges that it must work cooperatively with LSEs to implement the advice letter, SCE's statement goes too far and ignores the fundamentally divergent goals and scope of D.04-07-028 and the local requirements to be developed here. The Commission clearly stated that the "guidelines outlined in [D.04-07-028]" constitute a short-term "bridge" until long-term solutions are implemented through market design changes and resource adequacy requirements, and that its "goal is to see

incremental improvement, not perfection.”<sup>1</sup> The intent of the procurement advice letter is not to duplicate the efforts on local capacity requirements in resource adequacy, but to enhance reliability in the short term to the greatest extent possible. Thus, the ongoing efforts in this docket should not exempt SCE or any other LSE from their obligations under D.04-07-028.

## **II. The Draft Decision’s Requirement that Resources Be Made Available to the CAISO is Not Commercially Unreasonable**

SCE is the only party that opposes the Draft Decision’s proposal that eligible bilateral capacity contracts include provisions requiring that the procured capacity be made available to the CAISO either through LSE scheduling or bids into CAISO administered markets.<sup>2</sup> (Draft Decision at § 3.8.2.) SCE provides no analysis or reasons for its position, but simply states that the Draft Decision “is commercially unreasonable and will only frustrate LSE efforts to become fully resourced.” (SCE Comments at p. 10.) The Commission should reject SCE’s unsupported claim. The bilateral resource adequacy model provides LSEs with considerable flexibility in structuring their portfolios and allows for implementation of effective enforcement mechanisms.

## **III. The Concern Over Limitations on Intra-Control Area System Contracts Confuses or Blurs Capacity and Energy Products**

The Draft Decision correctly places limitations on the eligibility of intra-control area system contracts to count as qualifying capacity. Many of the concerns raised over restricting the use of intra-control area system contracts for resource adequacy rest on confusion between capacity and energy products. The core purpose of a resource adequacy requirement is to ensure that sufficient capacity is committed and available “when and where” needed to serve California load. Intra-control area system or “firm liquidated damages” contracts conflict with that core purpose because, among other reasons, the underlying resource(s) cannot be identified, which is necessary to ensure the same capacity is not relied on to meet multiple customer needs, i.e.,

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<sup>1</sup> D.04-07-028, mimeo at p. 6.

<sup>2</sup> See, e.g., SDG&E at p. 8; Duke Energy North America at p. 8; Independent Energy Producers Association at p. 3; Western Power Trading Forum at 5-6.

double-counted. However, as accurately stated by SDG&E, “use of such contracts going forward to optimize *energy* requirements need not be restricted in order to meet the proposed post-2004 preference favoring physical, iron-in-the-ground resources to meet the ‘first generation’ resource adequacy requirements.” (SDG&E Comments at p. 8 [emphasis added].) The CAISO agrees – liquidated damages contracts can remain a standard product in constructing an LSE’s energy portfolio after 2004.

In addition, parties continue to mischaracterize the legal obligations embodied in firm liquidated damages contracts. For example, AReM loosely states firm liquidated damages contracts provide for physical delivery that “cannot be interrupted for economic reasons but only for reasons of force majeure,” and that the contracts employ liquidated damages as a “remedy for breach of contract.” (AReM Comments at p. 5.) This is inaccurate. Rather, delivery is not “excused” by economic reasons, only force majeure events, and thus a supplier that fails to deliver may simply pay replacement costs. Only if the supplier does not pay the replacement cost is the contract “breached,” justifying termination. Clearly, the ability to satisfy contractual performance through an economic remedy fails to fulfill the objective of a well-defined resource adequacy obligation to have sufficient capacity committed to serve California loads.

#### **IV. The Draft Decision Incorrectly Applies the Test for Allocating Import Capacity to Exporting from Generation Pockets**

Several parties properly pointed out that the Draft Decision incorrectly applied the proposal for allocating import capability on the basis of CAISO transmission access charges as the method for allocating limited generation export capability to the aggregate of load. This confusion should be corrected. Moreover, the adoption of a test allocating generation export capability to the aggregate of load constitutes a necessary predicate to the CAISO’s ability to complete the deliverability baseline analysis. Accordingly, in order to allow timely completion of the baseline analysis, the CAISO recommends that the Commission adopt the following allocation hierarchy:

Deliverability limitations among multiple existing generators that contribute to a constraint should first be resolved by allocating capacity to generation that elected to finance the transmission upgrades identified in their interconnection study for deliverability purposes. Second, to the extent there are multiple units with the same priority, allocation of deliverability limitations would be based on the incremental flow impact that each generator contributes to the transmission constraint.

The CAISO's proposed methodology is consistent with SCE's proposal and the CAISO's prior workshop input and therefore received consideration during the Phase 1 workshop process.<sup>3</sup>

#### **V. The Draft Decision Incorrectly Describes Demand Response Eligibility Limitations**

The CAISO agrees with SCE and PG&E that the Draft Decision incorrectly interprets and applies the CAISO's analysis reflected in Appendix G of the workshop report. As PG&E states, "[t]he .89% cap was intended to apply, however, only to 2-hour [demand response ("DR")] programs, and should not limit all DR regardless of the number of hours of operation." (PG&E Comments at p. 4.) The CAISO conducted this analysis to identify the quantity of load that was present in the 2-hour, 4-hour, and 6-hour intervals of the system-wide load duration curve.

The CAISO supports allowing DR programs to qualify and be counted as qualified capacity in an LSE's resource adequacy compliance. However, the load that participates in DR possesses expectations regarding the duration of any potential interruption in service. Certain programs may be designed for a two-hour interruption, while other programs may involve longer periods, such as 4 hours, 6 hours, etc. Appendix G of the workshop report tested the amount of load that would exist at these time intervals on peak load days. Consequently, the CAISO supports imposing quantity limitations on DR products consistent with the Appendix G analysis of the system-wide load duration curve. The absence of such limitations would potentially degrade operational reliability.<sup>4</sup>

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<sup>3</sup> SDG&E has recommended the final interim decision be clarified to state that "generators located in 'generator pockets' need not be simultaneously deliverable in order to be qualified as meeting resource adequacy requirements." (SDG&E Comments at p. 7) This clarification, if taken to the extreme, would result in no requirement for generation to be deliverable to the aggregate of load. SDG&E's comments are too vague and should be disregarded.

## **VI. The CAISO Agrees That LSEs Should Use the Current Customer Approach in Forecasting their Load**

The CAISO agrees with TURN that application of the “current customer” method to LSE load forecasting is preferable to the Draft Decision’s direction that all LSEs “prepare load forecasts on the basis of their best estimate of future customers and loads.” The current customer method assures that all customers will be counted and that the effectiveness of the Commission’s resource adequacy requirement will not be undermined by the incentives inherent in the approach adopted by the Draft Decision. The development of a tradable capacity product could address load fluctuation concerns and will be addressed as a second-generation issue.

## **VII. Phase 2 Should Be Expanded**

The Draft Decision identified local resource adequacy requirements and development of a multi-year forward commitment as “second generation” items. In its opening comments, the CAISO disagreed with deferring consideration of local capacity requirements, but understood the Draft Decision’s rationale. Given the broad based support for incorporating local resource adequacy requirements into Phase 2, the CAISO renews its request to accelerate consideration of such issues.<sup>5</sup> In addition, the CAISO supports considering a multi-year forward commitment in Phase 2. The expedited adoption of a multi-year forward commitment involves a reasonably straightforward assessment that could be done without substantially impairing other Phase 2 efforts and would have a salutary effect on the balance of supply and load.<sup>6</sup>

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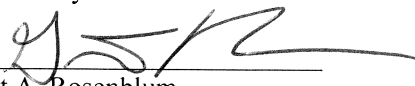
<sup>4</sup> To clarify this point, if more than .89% of 2 hour DR is able to qualify for resource adequacy capacity, the CAISO may have insufficient resources to serve load during the top hours of a peak day. For example, the CAISO may require 2% load reduction over the peak period of four hours, yet a portion of this capacity is only willing to interrupt for two hours, thus creating a shortfall in the remaining two hours of the peak period. Alternatively, the qualifying capacity quantity must be reduced by one-half to reflect that the initial 2-hour load products will return and a second block of load must be dispatched.

<sup>5</sup> Parties such as PG&E, TURN and Western Power Trading Forum advocate accelerating consideration of local capacity requirements.

<sup>6</sup> Only AreM spoke out against the Draft Decision’s clarification that the 15-17% planning reserve margin applies to the entire year and its adoption of a 100% month-ahead commitment obligation. The CAISO will address this issue in comments on Commissioner Lynch’s Alternate Draft Decision.

September 27, 2004

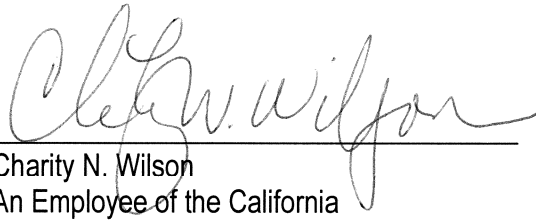
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## CERTIFICATE OF SERVICE

I hereby certify that I have served, by electronic mail, a copy of the foregoing Reply Comments of The California Independent System Operator Corporation on Administrative Law Judge Wetzell Regarding Interim Opinion on Resource Adequacy to each party in Docket No. R.04-04-003.

Executed on September 27, 2004, at Folsom, California.

A handwritten signature in cursive script, appearing to read "Charity N. Wilson", written over a horizontal line.

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