

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



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Order Instituting Rulemaking to Integrate and Refine  
Procurement Policies and Consider Long-Term  
Procurement Plans.

Rulemaking 10-05-006  
(Filed May 6, 2010)

**PREHEARING CONFERENCE STATEMENT OF THE  
INDEPENDENT ENERGY PRODUCERS ASSOCIATION**

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Date: December 16, 2010

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Pursuant to the Administrative Law Judge’s Ruling Setting Prehearing Conference, dated December 7, 2010, the Independent Energy Producers Association (IEP) submits its prehearing conference statement. IEP’s statement will address two topics: the implications for this proceeding of a motion recently filed in another proceeding, and the need to establish the basis for fair comparisons between bids submitted by independent power producers for power purchase agreements (PPAs) and bids for utility-owned generation (UOG).

**I. THE CAISO’S MOTION IN THE RESOURCE ADEQUACY PROCEEDING**

IEP takes this opportunity to alert the Commission and the parties to a development in another proceeding that could (and perhaps should) have implications for this long-term procurement plan (LTPP) proceeding. Specifically, on November 30, 2010, the California Independent System Operator Corporation (CAISO) filed a motion in the current Resource Adequacy (RA) proceeding, R.09-10-032. In that motion, the CAISO sought an expansion of the scope of the RA proceeding to include consideration of a proposal to procure “non-generic capacity” through the RA program. By “non-generic capacity,” the CAISO means certain operational characteristics of generating plants, including ramping rates, regulation

capabilities, and start-up times. As a result of its investigation of the effect of increasing levels of renewable energy on the CAISO-operated grid, the CAISO identified a reliability need for some types of non-generic capacity, which it proposes to include in the RA capacity procurement obligation assigned to load-serving entities (LSEs). Requiring LSEs to procure this non-generic capacity as part of their RA obligation is intended to support the integration of renewable resources, which are procured to meet the Renewables Portfolio Standards (RPS) goals established by the Legislature and the resource needs identified in the LTPP proceeding, using mechanisms developed in the LTPP proceeding.

IEP responded to the CAISO's motion on December 15, 2010, and a copy of IEP's response is attached to this statement. In its response, IEP noted that the CAISO's motion highlighted the need for a bridge between the RA proceeding, with its narrow and sometimes myopic focus on a single calendar year, and the LTPP proceeding, with its 10-year planning horizon and record of stimulating competitive procurement of needed resources. In particular, the CAISO's motion points out the need for the LTPP proceeding to consider the longer-term need for more specialized services or "products," in addition to the plain vanilla capacity that has been the focus of earlier LTPP efforts.

To be sure, the Scoping Memo in this proceeding recognizes the need to develop a "methodology for the most appropriate and cost effective ways to address the shortages" in locally constrained areas.<sup>1</sup> The CAISO's motion, however, points out two larger needs. First, the LTPP proceeding needs to consider reliability needs not just at the overall system or utility service area level, but also at the more detailed levels of the RA proceeding and the CAISO's motion. Second, the LTPP proceeding needs to ensure that the specialized products that are

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<sup>1</sup> Scoping Memo, p. 21.

needed to maintain the efficiency and reliability of the grid will be available when they are needed. Because the contracts for RPS-eligible energy extend for 10, 20, or even 25 years, the Commission should carefully consider whether capacity with the operational characteristics identified by the CAISO as needed to support renewables integration should similarly be procured on a long-term basis, using the longer-term, forward-based procurement mechanisms associated with the LTPP.

## **II. THE NEED FOR A FAIR COMPARISON METHODOLOGY**

In the order instituting the last LTPP proceeding (R.08-02-007), the Commission designated the following issue for consideration in Phase 2:

- Evaluation of whether and how refinements can be made to the bid evaluation process to ensure fair competition between power purchase agreements and utility-owned generation bids, and alternatives to the competitive market approach where competition cannot be used to reach equitable and efficient outcomes.

IEP had raised this issue in the preceding LTPP proceeding (R.06-02-013) and was pleased to see that the Commission recognized the need to address an issue that is central to the Commission's hybrid market structure. Despite the importance of this issue, however, the Commission in the order instituting the current LTPP proceeding (R.10-05-006) closed R.08-02-007 without ever taking up the Phase 2 issues.

The need for a fair comparison methodology has not gone away while the Commission deferred consideration of this issue. In a recent decision on projects selected in the 2008 long-term solicitation of Pacific Gas and Electric Company, for example, questions were raised about the valuation of a UOG project and the uncertainty introduced into that valuation by assumptions based on the 30-year useful life of the UOG project compared to a ten-year term

used for the valuation of competing PPAs.<sup>2</sup> These are the sorts of issues that should be resolved in advance, before the solicitation is conducted, and not at the end of the process when the Commission is confronted with the choice between competing projects.

The Scoping Memo for this proceeding again identifies as an issue “refinements to bid evaluation in competitive solicitations (particularly with respect to UOG bids).” While IEP is pleased to see that the Commission has once again indicated a desire to address and resolve this issue, the issue has been assigned to Track III, Phase 2, which raises the prospect that another LTPP proceeding will be concluded without addressing this issue. According to the Scoping Memo, Track III, Phase 2 issues are scheduled to be considered starting in Spring 2011 and a proposed decision on these issues is scheduled for Fall 2011. IEP respectfully urges the Commission to give this issue the priority it deserves and to ensure that at least this issue is resolved on the schedule indicated in the Scoping Memo.

### **III. CONCLUSION**

IEP respectfully offers these comments for the Commission’s consideration as it develops the detailed case organization and schedule for this proceeding.

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<sup>2</sup> D.10-07-045, p. 37.

Respectfully submitted this 16th day of December, 2010 at San Francisco,  
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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Annual Local Procurement Obligations.

Rulemaking 09-10-032  
(Filed October 29, 2009)

**RESPONSE OF THE INDEPENDENT ENERGY PRODUCERS  
ASSOCIATION TO THE MOTION OF THE CALIFORNIA  
INDEPENDENT SYSTEM OPERATOR CORPORATION FOR  
EXPANSION OF THE PHASE 2 SCOPE**

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Date: December 15, 2010

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OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Annual Local Procurement Obligations.

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ASSOCIATION TO THE MOTION OF THE CALIFORNIA  
INDEPENDENT SYSTEM OPERATOR CORPORATION FOR  
EXPANSION OF THE PHASE 2 SCOPE**

Pursuant to Rule 11.1 of the Commission's Rules of Practice and Procedure, the Independent Energy Producers Association (IEP) submits its response to the *Motion of the California Independent System Operator Corporation for Expansion of the Phase 2 Scope to Include a Proposal for Procurement of Non-Generic Capacity Through the Resource Adequacy Program*, filed on November 30, 2010.

In its motion, the California Independent System Operator Corporation (CAISO) proposes to expand the scope of Phase 2 to include (1) a consideration of a proposal to include specialized functions, or operational characteristics of generating units, as part of the month-ahead resource adequacy (RA) procurement requirement; (2) a description of the CAISO's non-generic capacity program, in which the CAISO proposes to conduct a survey of key operating characteristics of existing generation and provide advisory information on the expected need for certain operational requirements for the RA showing compliance year; and (3) a proposal to expand current RA year-ahead showing to a full year, rather than just the summer months.

Without taking a position on the substance of the CAISO's motion, IEP observes that the motion raises issues with wide-ranging implications that deserve a full discussion at the Commission. IEP respectfully urges the Commission to expand the scope of Phase 2 of the RA proceeding as the CAISO requests. More broadly, IEP urges the Commission to coordinate RA proceedings and Long-Term Procurement Plan (LTPP) proceedings, to avoid duplication and to ensure that the reliability of the grid and the Commission's competitive procurement policies can be maintained as California incorporates increasing levels of renewable energy. IEP urges the Commission to make sure that the LTPP proceeding has an adequate record to act on the issues raised by the CAISO's motion if the Commission determines that the LTPP proceeding is a more appropriate forum for action on these issues.<sup>1</sup>

The CAISO's motion raises two sets of issues with broader implications. First, the motion raises the issue of who should bear primary responsibility for procuring the products that may be needed to reliably integrate larger percentages of renewable energy into the electrical system. The CAISO in its motion seems to propose that load-serving entities (LSEs) with existing obligations to procure RA capacity should also be responsible for procuring additional products needed for renewables integration. On the other hand, the Federal Energy Regulatory Commission (FERC) has issued a Notice of Proposed Rulemaking on the Integration of Variable Energy Resources<sup>2</sup> that proposes to require Transmission Owners to offer regulation and frequency response service in connection with transmission service to variable energy resources (*i.e.*, intermittent renewable generators). Thus, the question of responsibility for providing the

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<sup>1</sup> IEP will be raising similar concerns about the need for coordination between the RA proceeding and the LTPP proceeding at the prehearing conference in R.10-05-006 scheduled for December 20.

<sup>2</sup> RM10-11-000, November 18, 2010.

services needed to integrate increasing levels of renewable resources needs to be resolved and coordinated at both the federal and state levels.

Second, the CAISO's motion raises issues in the RA proceeding that interact with issues ordinarily resolved in the LTPP dockets. The CAISO's proposals appear to grow out of its conclusion that renewables integration can have implications for reliability and that capacity with certain operational characteristics is needed for the reliable integration of renewable resources into the electric system. Issues related to renewables integration are already being considered in the current LTPP proceeding (R.10-05-006), so there is a potential for duplication or inconsistent resolutions if issues related to renewables integration are addressed in two separate dockets. In addition, the choice of where the CAISO's issues are addressed can have some important implications:

- All LSEs, including non-utility Electric Service Providers, are subject to RA capacity procurement obligations; only the investor-owned utilities (IOUs) are subject to the Commission's order in the LTPP proceeding.
- If procurement of RA capacity is insufficient to meet the system's needs, the remedy is backstop procurement by the CAISO at cost-based compensation; the LTPP proceeding's policy framework is "competitive market first," with preemptive procurement by an IOU only as a last resort, in truly extraordinary circumstances.<sup>3</sup>

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<sup>3</sup> D.07-12-052, p. 209.

- The RA proceeding has an annual focus; the LTPP proceeding considers a 10-year planning horizon.

At this point, IEP cannot predict whether the solutions to the problems the CAISO's motion identifies are ultimately best resolved in the RA proceeding or in the LTPP proceeding. In these circumstances, a record should be developed in both proceedings so that the Commission has the procedural flexibility to fashion the most appropriate solution.

In that sense, the CAISO's motion highlights the need for a bridge between the RA proceedings and the LTPP proceeding. For various reasons, the RA proceeding has had a narrow focus on a single calendar year. But this focus on a single year has proved to be myopic. As IEP noted in its Proposal on Phase 2 Issues, filed in this docket on November 30, 2010, the RA program has utterly failed to achieve the Commission's initial fundamental objective for the RA program of providing "appropriate incentives for investment in generation resources where they are needed."<sup>4</sup>

For its part, the LTPP proceeding has a longer-term focus and a record of stimulating competitive procurement of needed resources, but it has so far considered reliability needs only at the overall system or IOU service area level, not at the more detailed levels of the RA proceeding and the CAISO motion.

The CAISO motion highlights the need for the RA proceeding to take a longer-term focus, to secure the availability in future years of the resources that can provide the specialized operation characteristics required to maintain reliability as the system incorporates greater proportions of renewable energy. The LTPP proceeding needs to continue its work on

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<sup>4</sup> D.06-06-064, p. 22.

renewables integration and to consider reliability among the elements it incorporates in the construction of the resource plan. For the present, the Commission needs to make sure that it has an adequate record in both the RA proceeding and the LTPP proceeding to enable it to address these issues in a comprehensive manner while avoiding as much as possible any duplication of effort in the two proceedings.

For these reasons, IEP respectfully urges the Commission to expand the scope of Phase 2, as the CAISO requests, and to also make sure that the LTPP proceeding has an adequate record to act on these issues if the Commission determines that the LTPP proceeding is a more appropriate forum for action on these issues. More broadly, IEP urges the Commission to coordinate RA proceedings and LTPP proceedings, to avoid duplication and to ensure that the reliability of the grid and the Commission's competitive procurement policies can be maintained as California incorporates increasing levels of renewable energy.

Respectfully submitted this 15th day of December, 2010 at San Francisco,  
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**CERTIFICATE OF SERVICE**

I, Melinda LaJaunie, certify that I have on this 16<sup>th</sup> day of December 2010 caused a copy of the foregoing

**PREHEARING CONFERENCE STATEMENT OF THE  
INDEPENDENT ENERGY PRODUCERS ASSOCIATION**

to be served on all known parties to R.10-05-006 listed on the most recently updated service list available on the California Public Utilities Commission website, via email to those listed with email and via U.S. mail to those without email service. I also caused courtesy copies to be hand-delivered as follows:

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 16<sup>th</sup> day of December 2010 at San Francisco, California.

*/s/ Melinda LaJaunie*  
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