



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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

R.09-10-032
(Filed October 29, 2009)

COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U-338E)
REGARDING PRELIMINARY MATTERS PERTAINING TO THE SCOPE,
SCHEDULE, AND ADMINISTRATION OF THIS PROCEEDING

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Dated: **November 6, 2009**

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

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In accordance with the October 29, 2009, order instituting rulemaking for this proceeding (“Order”), Southern California Edison Company (“SCE”) respectfully submits these comments on preliminary matters pertaining to the scope, schedule, and administration of this proceeding. SCE generally supports the scope and schedule of the proceeding as outlined in the Order. Moreover, for the most part, SCE supports the inclusion of the topics identified in Appendix A of the Order including the review of the Path 26 counting constraint, examination of issues surrounding load migration (especially in light of the changes resulting from Senate Bill (“SB”) 695, and evaluation of resource adequacy (“RA”) administration issues, particularly as they relate to improved coordination between the Commission and California Independent System Operator (“CAISO”) compliance filing obligations.

Nevertheless, SCE believes the following additional issues should be included in the scope of this proceeding:

- Given the adoption of the CAISO’s Standard Capacity Product (“SCP”) and its financial implications for unit forced outages, the Commission should re-examine the existing Local Capacity Requirement (“LCR”) reporting rules to determine whether changes are needed to allow for unit substitution in local areas.

- The Commission should consider the treatment of line losses with respect to Demand Response (“DR”) resources.

Finally, the Commission is addressing which type of DR programs it should count towards RA in Phase III of the DR Rulemaking (R.07-01-041). SCE believes that it is premature to consider this issue in this proceeding.

I.

SCE’S COMMENTS

A. Local Area Substitution

The CAISO tariff for the SCP provides that RA resources must be “available” for a percentage of the peak hours in a given month (with a 2.5% tolerance band) or face the imposition of unavailability charges.¹ A unit’s availability is reduced by forced outages, but not planned outages.² The tariff, however, also provides a provision that allows load-serving entities (“LSEs”) to mitigate the financial impacts of forced outages by substituting capacity from non-RA units.³ If the resource is considered a local resource, the tariff includes an additional requirement that the substitute unit have equivalent characteristics to the RA unit.⁴

The current RA rules require all LSEs to list all of their contracted local resources in their RA plans, regardless of whether that resource is actually needed to fulfill the LSE’s LCR obligation.⁵ Because all of these resources are included on an LSE’s RA plan, the LSE is limited in its ability to take advantage of the unit substitution rule, which may help mitigate customer costs.

¹ See CAISO Tariff Section 40.9.6.1.

² See *id.* Section 40.9.4.2.

³ See *id.* Section 40.9.4.2.1.

⁴ See *id.* Section 40.9.4.2.1.

⁵ See D.06-06-064 at 42.

Accordingly, SCE recommends that the Commission reconsider its local RA reporting requirement.⁶

B. Line Losses For Demand Response Resources

Previous RA decisions permit dispatchable DR resources to count for RA compliance.⁷ A gap, however, remains in the treatment of these resources with respect to avoided transmission and distribution losses. Although DR is a load, it is not reported as a reduction to the RA load forecast. Instead, DR is reported as a generation resource. The RA load forecast, however, is adjusted upward to account for transmission, unaccounted for energy, and distribution losses. Consequently, DR resource allocations should be grossed up to include the line-loss impacts they avoid. SCE urges the Commission to include this issue in the scope of this proceeding.

C. Coordination with Demand Response Rulemaking 07-01-041, Phase III

Appendix A of the Order states, “it may be appropriate to consider what types of DR programs are counted for RA and how these programs are classified and counted.”⁸ SCE, however, believes that such consideration is premature and would cause confusion since the Commission is already considering similar issues in Phase III of R.07-01-041. SCE urges the Commission to defer consideration of these types of DR issues in this proceeding, until final resolution of the issue in the DR rulemaking.

⁶ SCE notes that in this proceeding the Commission is considering the addition of a monthly local RA showing. SCE believes that any changes to the local reporting requirements should also be considered within this context as well.

⁷ See D.04-10-035, *mineo*, pp. 26-27, and D.05-10-042, *mimio*, pp. 51-54.

⁸ See R.09-10-032, *mimio*, p.1 of Appendix A.

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DATED: November 6, 2009

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commissioner's Rules of Practice and Procedure, I have this day served a true copy of COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U-338E) REGARDING PRELIMINARY MATTERS PERTAINING TO THE SCOPE, SCHEDULE, AND ADMINISTRATION OF THIS PROCEEDING on all parties identified in the attached service list(s).

Transmitting the copies via e-mail to all parties who have provided an e-mail address.
First class mail will be used if electronic service cannot be effectuated.

Executed this **6th day of November, 2009**, at Rosemead, California.

/s/Christina A. Sanchez

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