



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

**MOTION OF PACIFIC GAS AND ELECTRIC COMPANY(39-E), SOUTHERN
CALIFORNIA EDISON COMPANY (U 338-E), SAN DIEGO GAS & ELECTRIC
COMPANY (U 902-E), AND CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION TO MODIFY TRACK I SCHEDULE**

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Dated: **May 18, 2011**

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AND CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION TO
MODIFY TRACK I SCHEDULE**

Pursuant to Rule 11.1 of the California Public Utilities Commission’s (CPUC or Commission) Rules of Practice and Procedure, Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) (hereinafter referred to collectively as “Joint Utilities”) and the California Independent System Operator Corporation (ISO) request that the Commission modify the schedule for submission of Long Term Procurement Plan (LTPP) Track I testimony in this proceeding to allow additional time before the submission of (1) final modeling results for the CPUC required cases, and (2) final modeling results and associated testimony for the ISO sensitivity case and the Joint IOU common cases. The Joint Utilities and the ISO further respectfully request that the Commission adopt an expedited schedule for review of this motion, and request that the Commission require expedited replies to this motion within 5 days.

The development of LTPP Track I testimony relies upon the results of complex computer modeling performed by the ISO, the Joint Utilities and the Joint Utilities’ contractor, Energy and Environmental Economics, Inc. (E3). As a result of the review of the model and the preliminary results, the parties have recently identified numerous issues with the computer models and input data development that must be addressed. The models must then be rerun possibly a few times in order to confirm the changes and results. This will delay production of the final computer

model results. Therefore, the Joint Utilities respectfully request a four week extension from June 3, 2011 to July 1, 2011 of the deadline for the ISO and the Joint Utilities to serve the final results of the modeling runs, plus supporting testimony. Additionally, the Joint Utilities and the ISO plan to provide a comprehensive workshop within 10 days after the Joint Utilities file testimony to explain the results and modeling assumptions.

The Joint Utilities and the ISO do not herein propose dates for filing of intervenor testimony or reply testimony. However, the Joint Utilities and the ISO realize that intervenors may also require additional time in the procedural schedule for preparation of testimony. These extensions to the testimony filing dates may delay the year-end date for a decision until January 2012, unless other elements of the schedule can be shortened. Such a delay would have minor impacts on the schedule for the subsequent LTPP proceeding, but, as described below, will have significant implications for the overall quality of evidence available to the Commission in this proceeding. By providing additional time for the ISO, and the Joint Utilities (in consultation with the working group) to verify the study results and develop testimony that explains these results, coupled with an additional workshop before intervenor testimony is filed, it is anticipated that the time needed for the evidentiary hearings could be reduced. Nonetheless, the Joint Utilities and the ISO prefer that sufficient time be provided now for testimony development even if the Track 1 decision is not issued until early 2012 rather than in December 2011 as currently scheduled.

The driver for the requested extension is the complexity of the computer modeling that the Joint Utilities and the ISO are conducting. The computer modeling effort in this proceeding is essentially very new, the state of the art in such modeling efforts, and is one of the most aggressive and complicated energy system modeling efforts underway in the United States today. Through this effort, we are attempting to better understand the issues associated with integrating a large amount of intermittent renewable resources in the electric grid. This proceeding has been a learning process for all parties working with the complex computer models required for use in this proceeding. We are all working diligently towards the common goal of better understanding

the issues associated with this complex computer modeling and the results that are being generated.

Not surprisingly given the complexity of this modeling effort, the ISO and the Joint Utilities have had to find ways to overcome and resolve unexpected results and modeling challenges. The Joint Utilities have contracted with consultants to assist with the computer modeling, and have increased the available computer time for the work being performed so that modeling tasks can be broken up and run in parallel on many different computers. By taking these steps, the ISO and Joint Utilities were able to produce preliminary Step 1 and Step 2 study results for the four CPUC required scenarios that were provided to the parties on April 29, 2011 and discussed at the May 10, 2011 workshop. However, as described at the workshop, a review of preliminary results identified certain modifications and corrections that had to be made to the input assumptions and modeling logic.

So, despite our best efforts, we have fallen behind on the schedule necessary to produce somewhat realistic modeling results. The ISO and Joint Utilities had planned to have final, verified Step 2 results for 2020 for the four CPUC-required scenarios by April 29, 2011, a very aggressive schedule. As discussed above, problems with the April 29, 2011 submission were discovered, resulting in the need for significant revisions to the input assumptions which produced different results. At the May 10, 2011 workshop, the ISO described some of these problems and presented corrected results. For example, one of the modeling issues, a problem with maintenance scheduling that resulted in falsely identifying criteria violations (see page 101 of the ISO presentation), required Plexos software changes to correct the problem.

Leading up to the May 10, 2011, workshop the ISO had been collecting a list of items it needed to correct in the model. At the May 10, 2011 workshop, parties identified additional concerns with the model results, and the ISO has added these items to the list. Specifically, there are 13 items (with subparts) that must be corrected or updated in order for the study results to be of testimony quality. Attachment A to this motion contains a list of these corrections or modifications provided by the ISO today which comprises all of the changes that will be made to

the model at this time. Without these changes, the preliminary results presented at the May 10, 2011 workshop cannot be credibly sponsored by the ISO and the Joint Utilities. Further, the results would not provide a reliable basis upon which the Commission can base a decision. As a result, those involved in the modeling effort will need to incorporate the modifications and corrections into the models and rerun the scenarios that were initially performed about a month ago.

At present, the ISO has essentially “locked down” final model assumptions as of Tuesday, May 17, 2011, and is in the process of rerunning Step 2 analysis for the four CPUC-required scenarios. Once these runs have been completed and verified, work on finalizing Step 3 analysis can commence, including running sensitivity cases and the additional Plexos model runs necessary to develop the “baseline” from which performance metrics are measured. The Joint Utilities are working in parallel with this effort to develop a Joint Utilities case analysis. However, since the Joint Utilities are attempting to use as many elements of the ISO model as possible in order to improve consistency across the various scenarios, the completion of this common case must, of necessity, lag behind the ISO’s completion of the updates and re-running the model to produce accurate results.. This modeling work and prepared testimony to support it cannot be completed by June 3, 2011. Unfortunately, without an extension of this scheduled testimony date, the results and supporting testimony that can be completed by June 3 will provide little useful information for the record of this case. Hence, the Joint Utilities and the ISO request a four-week extension from June 3, 2011 to July 1, 2011, so that the ISO and the Joint Utilities can serve the final results of the modeling runs, plus supporting testimony.

This schedule will support development of final results of the modeling runs, and effective supporting testimony, assuming that there are no further substantial issues with the computer models beyond what we have experienced to date. The Joint Utilities request that the Commission establish an expedited reply period for this motion of 5 days so that the Commission can expeditiously rule on it.

As discussed above, the Joint Utilities respectfully request that the Commission modify the LTPP Track I schedule for this proceeding by:

- Extending the date for submission of (1) final modeling results for the CPUC required cases, and (2) final modeling results and associated testimony for the ISO sensitivity case and the Joint IOU common cases from June 3, 2011 to July 1, 2011; and
- Setting a 5 day time period for responses to this motion.

Respectfully submitted,

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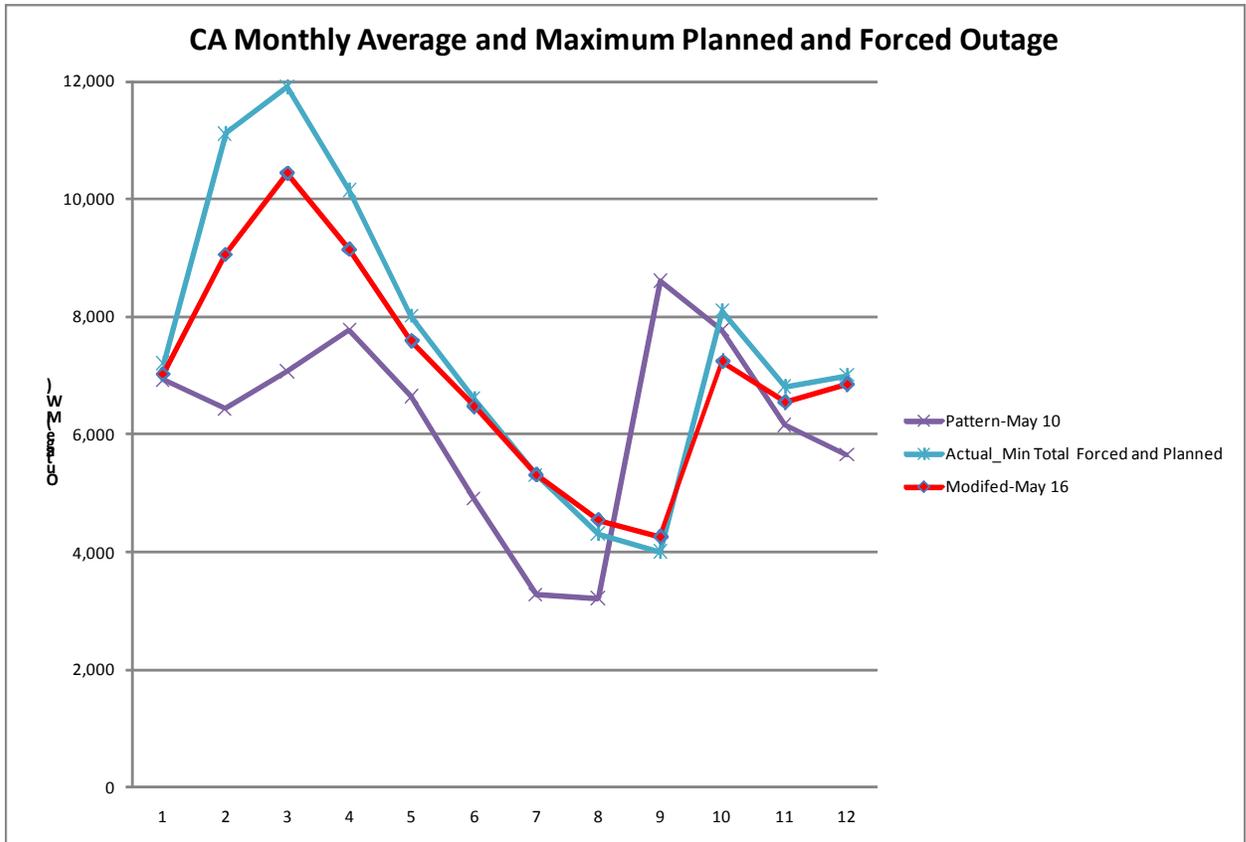
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SOUTHERN CALIFORNIA EDISON COMPANY
SAN DIEGO GAS & ELECTRIC COMPANY

May 18, 2011

Attachment A

**Step 2 Analysis –
Draft Database and Model Modifications from April 29th Results**

- The ISO updated the database with corrected the calendar year for load profile, renewable profiles, and Step 1 requirements.
- The ISO updated the generator maintenance schedule in the database.
 - Methodology: Try to match monthly average total outage MW (sum of forced and planned outages) with the ISO historical monthly minimum total outage levels by generating a new set of monthly maintenance rate distribution factors and by increasing unit forced outage rate and maintenance rate. The forced outage rate and maintenance rate of CHP and nuclear units were not being increased.
 - The maintenance schedule for Humboldt units were adjusted so they were not out for maintenance in Nov-Feb due to local reliability needs.
 - Consideration for future runs: match outage schedule to historical outages by technology type as more data becomes available.
 -



- The operating characteristics of several generators were updated.
 - CCGT plant specific heat rates were changed with public sources to support changes.
 - El Segundo heat rate restored to values reflective of a dry cooled unit.
 - The IOUs used a general rule of thumb for CT characteristics the state to avoid skewed dispatch of CTs, including generic units.
 - LM6000
 - Pmin = 19 MW
 - Heat rate point 1 = 11,500 Btu/kWh
 - Heat rate point 2 = 10,500 Btu/kWh (inland) or 10,200 Btu/kWh (coastal)
 - LMS100 – Pmin = 50 MW (based on a GE brochure)
- The ISO included CoolwtrS3 and CoolwtrS4 units in the database and did not retire it in 2015 as stated in the CPUC Scoping memo; these units are not assumed to retire in ISO transmission planning assumptions.
- Review and updated the reserve contribution capability of all dispatchable units in California.
 - Rule of thumb: New CCGTs can provide offline non-spin; existing CCGTs cannot.
- The ISO included dynamically scheduled reserve contribution for 4 resources outside of the ISO area that contribute towards ISO AS and Load Following requirements (not energy).
 - APEX_2_MIRDYN (505 MW)
 - MRCHNT_2_MELDYN (439 MW)
 - MSQUIT_5_SERDYN (1,182 MW)
 - SUTTER_2_PL1X3 (500 MW)
- The ISO updated hurdle rates in the database to those in PCO for outside of California. Inside of California rates were kept to vintage rates.
- The BC_AB zone was disaggregated to individual zones: BC and AESO.
 - The disaggregation enables enforcement of a \$48 hurdle rate to export power into Alberta from the Northwest, Montana and BC, which was being seen in large quantities in the last set of runs.
- To avoid unrealistic number of yearly starts for coal units outside of CA, ~60 plants of 300+ MW were changed to mixed integer programming mode so they could be unit committed.
- After discussion with PG&E, Helms pumping limits were adjusted.
 - 2 pumps available in Oct-May; 1 pump available June-Sept.
 - Pumps are only available to pump during off-peak hours.
 - Model enforces monthly energy limits provided by PG&E.
- Update to SCIT.
 - Use of latest SCIT model.
- ISO update to dedicated imports methodology, to reflect ownership rights of external resources.
- To avoid unrealistic mechanism to address violations in the model, a new generic resource reflective of storage or curtailment was created to absorb Load Following Down shortfall.

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 **MOTION OF PACIFIC GAS AND ELECTRIC COMPANY (39-E), SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E), SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E). AND CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION TO MODIFY TRACK I SCHEDULE** 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 **18th day of May, 2011**, at Rosemead, California.

/s/ Christina Sanchez
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SOUTHERN CALIFORNIA EDISON COMPANY

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California Public Utilities Commission

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