

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

In the Matter of the Application of SOUTHERN
CALIFORNIA EDISON COMPANY (U 338-E)
for Approval of its Renewable Integration and
Advancement Program.

Application No. 08-03-014
(Filed March 18, 2008)

**RESPONSE OF THE CALIFORNIA WIND ENERGY ASSOCIATION TO THE
APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) FOR
APPROVAL OF ITS RENEWABLE INTEGRATION AND ADVANCEMENT PROGRAM**

CALIFORNIA WIND ENERGY ASSOCIATION
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April 18, 2008

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I. INTRODUCTION

Pursuant to Rule 2.1 of the California Public Utilities Commission ("Commission") Rules of Practice and Procedure ("Rules"), the California Wind Energy Association ("CalWEA") respectfully submit these comments on Southern California Edison Company's ("SCE") Application for Approval of its Renewable Integration and Advancement Program ("Application"), filed on March 18, 2008. CalWEA appreciates SCE's interest in proactively investigating renewable energy integration issues, as contained in its Application for Approval of its Renewable Integration and Advancement Program ("RIA Program"). Meeting California's ambitious goals for renewable energy will certainly require study and planning.

CalWEA's comments are intended to encourage appropriate coordination between the RIA Program and related efforts such that the RIA Program complements those efforts rather than duplicates them. CalWEA's comments fall under Issue A, as presented by SCE in its Application: "Will the RIA serve customer interests by developing technology and practices to ensure reliable system deliveries and facilitate growth in the renewable industry?"

II. ARGUMENT

The integration issues studied by SCE should complement the California Independent System Operator's ("CAISO") Renewable Resource Integration Plan. To serve customer interests, the CAISO's effort (which CalWEA understand is still in development) will — or should — address all system integration issues relating to high penetrations of renewable resources on the CAISO-controlled grid. The RIA Program should be focused on issues that are either unique to SCE's system or that complement the CAISO's effort. The CAISO should call upon SCE's technical facilities and staff as needed in its effort.

Complementarity with the CAISO's study is declared, but not demonstrated, in the Application. The Application states: "Projects and studies undertaken and funded by the RIA program may focus, for example, on the feasibility of energy storage systems, the need for additional spinning reserves, improvements in frequency regulation, advanced system protection, communications, and assessment of resource adequacy requirements." These possible project areas are not unique to SCE's system, and will or should be covered by the CAISO's Plan and/or other venues. In particular:

- Spinning reserves and frequency regulation are governed by the CAISO, and the CAISO runs markets to procure these services. The service specifications are not unique to SCE and are better addressed by CAISO and WECC.
- Energy storage should almost always be analyzed and applied at the power system level. It is very inefficient, economically, to use storage to balance specifically specific resources. The same storage project will, in all but the rarest cases, be more effective if it responds to power system needs rather than to specific wind projects or even to collections of wind projects. Again, this will be studied by the CAISO.
- Similarly, although SCE's Application states that "increased reserves and ancillary service requirements may be needed to manage sudden reductions or increases in capacity and changes in voltage and frequency" due to the inherent variability of wind generation, these services are not uniquely needed for wind. Changes in wind output, for large wind fleets, have a relatively minor impact on regulation and contingency reserve requirements, and these issues fall under the purview of the

CAISO. Better forecasting of large wind ramps¹ and developing market responses – i.e., assuring that there is a deep stack of responsive generation, perhaps through additional ancillary services – would be better avenues for exploration than simply looking into the level of contingency reserves. However, these also fall under the CAISO’s area of authority.

SCE’s Application states, “At this time, there are no complete studies or data that explicitly outline the requirements, expectations, or costs of renewable integration specifically for SCE’s transmission and distribution system.” CalWEA disagrees. There have been a number of such studies done for the California system, including the CEC’s 2004 Renewables Portfolio Standard Renewable Generation Integration Cost Analysis, the CEC’s 2007 Intermittency Analysis Project (IAP), and the CAISO’s Renewable Resources Integration Report that are largely applicable to SCE’s (or, more appropriately, the CAISO’s) system. And, again, the CAISO is launching a supplemental extensive analysis effort this year. If SCE conducts its own study, it should explain why a unique focus on SCE’s system is justified that is not already addressed through these other efforts, or explain, in detail, how the effort will complement the CAISO’s plan. Should SCE’s effort duplicate effort in these areas, they should include a qualified technical review committee, including stakeholder participation, to guide actively the study. The CAISO is involving stakeholders in its effort, as did the CEC with its studies.

A more fruitful avenue for study by SCE, which would be complementary to the CAISO analysis, would be investigating demand-side resources, such as smart meters and plug-in hybrid cars, as means of providing system flexibility generally — to improve the system’s ability to respond to high levels of intermittent resources as well as outages and other system emergencies. A program that explores demand response potential could be valuable and, indeed, SCE has initiatives

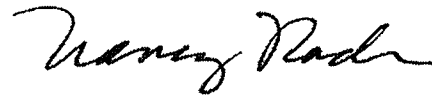
¹ To that end, it would likely improve the CAISO’s forecasting effort were SCE to enroll its wind qualifying facilities (“QFs”) in the CAISO’s intermittent scheduling program (the Participating Intermittent Resources Program, or PIRP).

underway in some of these areas.² As with energy storage, however, these new technologies provide capabilities that are not needed uniquely, or even primarily, to support renewable energy, and should not be billed as such.

III. CONCLUSION

In summary, CalWEA would like to see more details to ensure that SCE's efforts will "complement and interact with other efforts currently under way," as stated in the Application, and thus constitute an efficient use of ratepayer dollars.

Respectfully submitted,



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² See, e.g., Testimony of John Bryson, House Energy and Commerce Subcommittee Hearing on Energy and Air Quality, May 3, 2007.

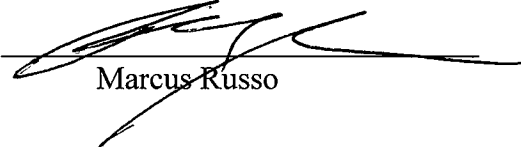
Certificate of Service

I hereby certify that I have this day served a copy of the

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on all known parties to R.06-05-027, R.06-02-012, R.06-02-013, R.08-03-009 and I.05-09-005 by sending a copy via electronic mail and by mailing a properly addressed copy by first-class mail with postage prepaid to each party named in the official service list without an electronic mail address.

Executed on April 23, 2008, at San Francisco, California.


Marcus Russo