

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

Order Instituting Rulemaking to Consider)	Rulemaking No. 08-01-025
Annual Revisions to Local Procurement)	(Filed January 21, 2008)
Obligations and Refinements to the Resource)	
Adequacy Program)	
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**REPLY COMMENTS OF
THE CALIFORNIA WIND ENERGY ASSOCIATION,
THE AMERICAN WIND ENERGY ASSOCIATION,
THE SOLAR ALLIANCE, AND THE LARGE-SCALE
SOLAR ASSOCIATION
ON THE PROPOSED DECISION OF ALJ WETZELL**

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June 9, 2009

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REPLY COMMENTS OF THE CALIFORNIA WIND ENERGY ASSOCIATION, THE AMERICAN WIND ENERGY ASSOCIATION, THE SOLAR ALLIANCE, AND THE LARGE-SCALE SOLAR ASSOCIATION ON THE ALJ’S PROPOSED DECISION

Pursuant to Rule 14.3(d) of the Commission’s Rules of Practice and Procedure, the California Wind Energy Association (CalWEA), American Wind Energy Association (AWEA), the Solar Alliance (SA) and the Large-Scale Solar Association (LSA) – collectively, the Joint Renewables Parties – respectfully submit these reply comments on the Proposed Decision (PD) of ALJ Wetzell. These reply comments are limited to the issue of the “counting rule” used to determine the resource adequacy (RA) value of California’s wind and solar resources.

1. California’s Commitment to Renewables Deserves State-of-the-Art Analysis.

Establishing the RA value of intermittent renewables is a central issue in planning for a grid with 33% renewables. The Commission’s goal should be to support California’s world-class commitment to renewable generation with the industry’s “best practice” methods and analyses. Yet the PD has no discussion of industry best practice, and ignores a record that includes:

1. the results of the major renewables integration study that the California Energy Commission (CEC) conducted from 2003-2006, and whose results the Commission has adopted to set the capacity value of intermittent renewables in its RPS program;
2. several papers from the experts at the National Renewable Energy Laboratory reviewing the approaches used in the industry to determine the RA value of wind; and
3. substantial evidence that California’s current rules are consistent with the practices of every other major control area in the U.S.¹

¹ See the CALWEA/AWEA January 15, 2009 Proposal, at 4-9 and Attachment A.

Furthermore, initial efforts to admit into the record a major new report from the North American Electric Reliability Council (NERC), which has responsibility for setting grid reliability standards in the U.S. and Canada, have been rejected, even though the ALJ's Ruling conceded the probable relevance of the report.² The NERC report recommends the use of the Effective Load Carrying Capacity (ELCC) method to assess the RA value of intermittent renewables and is material evidence of the industry's "best practice" in this area. California's current counting rule is consistent with NERC's direction, and is benchmarked to the most recent ELCC results for California from the 2006 CEC Integration Study, as shown in Table 2 of the CalWEA/AWEA January 15, 2009 proposal in this docket.³ Yet the PD includes no discussion of why California should turn its back on the clear direction of the rest of the electric industry in North America, particularly when the result significantly increases the utilities' procurement requirements.

The Joint Renewables Parties wish to clarify that they do not oppose updating the existing ELCC studies to which the current counting rules are benchmarked, if the Commission is concerned that new studies are warranted given the state's increasing commitment to renewables. For example, the record shows that the California Independent System Operator (CAISO) itself is undertaking a major study of integrating 33% renewables.⁴ This Commission should encourage the CAISO to include in this effort the ELCC studies that would more fully inform the issue of the RA value of intermittent renewables. In its new integration study, the CAISO will be running the models that also are used for ELCC analyses. It would be a logical and constructive step for the CAISO to include ELCC studies in its new work, just as prior CEC integration studies have included such analyses for the California market.

² See the ALJ's Ruling (May 27, 2009); Motion for Reconsideration of ALJ's Ruling (June 1, 2009).

³ The Joint Renewables Parties are very concerned with a statement by the three investor-owned utilities in the response that they filed yesterday to the Motion for Reconsideration of the ALJ's ruling deciding not to accept the NERC Report into the record. The utilities assert that "[w]hile Movants claim that the current intermittent QC counting regime should be retained because it compares favorably with ELCC approaches, they did not introduce evidence or specific California-based results during the RA workshop to prove this assertion." This ignores Table 2 of our January 15 proposal, which made precisely that showing, using the ELCC results from the CEC's 2006 Integration Study and the current counting rules applied to the major wind resource areas in California.

⁴ Workshop Report, at 18. Details on the CAISO's efforts related to the integration of renewable resources can be found at <http://www.caiso.com/1c51/1c51c7946a480.html>.

2. The Commission Should Not to Assume a Problem with the Current Counting Rule Based on Small Samples of Data on Wind Generation.

Last year the Commission decided to review the issue of the RA counting rule for wind on the basis of information presented by the Energy Division in the *2007 Resource Adequacy Report*. The CAISO's Opening Comments on the PD continue to cite this report, in particular its observation that during the top 20 load hours in 2007, wind resources met or exceeded their NQC only 5% of the time.⁵ The Joint Renewables Parties caution the Commission that the capacity contribution of intermittent resources cannot be assessed based on limited snapshots of wind generation over a few hours, even a few peak hours. This is not just our conclusion; it was also the conclusion of the experts on renewables integration who authored the CEC's 2006 Integration Study widely cited throughout this proceeding:

Ad hoc methods that calculate the renewable plant capacity factor over a very small number of hours surrounding the peak may not adequately capture any impacts on system reliability. For example, a wind plant that produces at its rated capacity during a very small number of hours surrounding the peak would be rated with a capacity value at or near its rated capacity. However, such a plant would not provide the same level of capability during other near-peak hours as a conventional plant could potentially provide. Conversely, a wind plant that is given a capacity value of 0 might contribute significant levels of output during near-peak hours when system reliability is still critical.⁶

In fact, the data on wind output in California confirms this last statement: wind production in California tends to be low during a few peak hours with the highest loads, but wind output is much higher during other, near-peak hours "when system reliability is still critical."⁷

The PD's exceedance method sets the capacity value of wind and solar at the level at which these resources can produce power with the 70% capacity factor of a baseload plant. The PD's method assumes, incorrectly, that the output of wind and solar plants makes no contribution to reliability in the 70% of peak hours when their output exceeds the NQC. This is contrary to

⁵ CAISO Opening PD Comments, at 2.

⁶ CEC Integration Study, at 26. The authors of this important study included Yuri Makarov and David Hawkins of the CAISO.

⁷ See Figures 3.15, 3.16, and 3.17 on pages 37-38 of Phase 1 of the CEC Integration Study, as discussed in the January 15, 2006 CalWEA/AWEA proposal at 5-6.

the record and fundamentally unfair to intermittent renewables, whose output is based on natural fluxes of sun and wind and whose capacity contribution must be assessed, not as a baseload unit, but on a probabilistic basis over a broader set of risky hours. The PD's result is particularly unfair given that the RA value of fossil-fueled thermal resources is set at their maximum rated capacity, without considering that this capacity is de-rated during hot, high-demand conditions.

3. The CAISO Continues to Ignore the Costs of the Exceedance Method.

The CAISO's opening comments assert that the PD's exceedance method will minimize the costs of backstop procurement, because wind and solar generators will produce at or above their RA value in most hours. The CAISO completely ignores the much higher RA capacity costs that would be incurred every month to replace the wind and solar capacity that will be severely de-rated under the exceedance method. There is no question that, if the exceedance method is adopted, the higher RA capacity costs in all months to replace de-rated wind and solar will far exceed the occasional costs of backstop procurement if the current counting rule is maintained. It is also not surprising that the parties that all would profit from the enhanced opportunity to sell more fossil-fueled RA capacity or to build more peakers to backup wind and solar favor the exceedance method and are silent on the cost issue. This is a significant ratepayer issue, which is why both DRA and TURN oppose the PD.

4. The PD Does Not Adopt a CalWEA *et al.* "Proposal."

The Joint Renewables Parties' opening comments anticipated that the CAISO would join the PD in incorrectly characterizing the PD's diversity adjustment as the adoption of a CalWEA *et al.* "proposal." The CAISO ventures even farther afield than the PD, recommending that, if the Commission is concerned that no results have been calculated for the PD's modified exceedance method, then the CalWEA *et al.* "proposal" to modify the exceedance method should be rejected! We commented on the diversity issue as a critique of the exceedance method, and it would make no sense to find that we failed to meet the burden of proof to support a proposal we opposed. We share TURN's concerns that the PD's modified exceedance method is entirely untested, which is particularly troubling given the problems that TURN highlights with the QC

data for wind and solar units.⁸

5. The Commission Should Defer the Issue of the Counting Rule for Wind and Solar to a Further Decision in This Proceeding or to the Next Review of RA Issues.

The opening comments of the CAISO echo the PD in asserting that a change to the current RA counting rule for wind and solar “is important for reliability as soon as practicable.”⁹ The Joint Renewables Parties question the need to rush to judgement on an issue that has significant long-term ramifications for renewable development in the state. There is nothing in the record of this case indicating a pressing near-term need to decide this issue in order to assure grid reliability. As TURN observes, demand is down and reserve margins up as a result of the economic crisis.¹⁰ The amounts of wholesale wind and solar generation on the CAISO system are modest (2,700 MW of wind and 400 MW of solar thermal), and are not expected to grow rapidly until new transmission infrastructure is completed in 2012-2013. What is important to the renewables industry – and to California ratepayers – is that the Commission looks carefully at the industry’s best practice in this area, considers how other control areas resolve this issue, adopts a method that has a solid link to comprehensive reliability analyses of the California market, and makes a decision that fairly values renewables in comparison to other types of generation. Unfortunately, the PD does none of the above, and as a result does not get this decision right.

Respectfully submitted,

/ s / R. Thomas Beach

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June 9, 2009

⁸ TURN Opening PD Comments, at 2-7.

⁹ PD, at 52; Opening PD Comments of the CAISO, at 4-5.

¹⁰ TURN Opening PD Comments, at 7. If additional assurance on this point is needed, the Commission can take official notice of the CAISO’s own *2009 Summer Loads and Resources Operations Preparedness Assessment*, released May 7, 2009, which forecasts base case planning reserve margins in excess of 30% in California this summer. See Table 1, page 4, at <http://www.caiso.com/23ab/23abd69829524.pdf>.

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused to be served a copy of the foregoing document, **REPLY COMMENTS OF THE CALIFORNIA WIND ENERGY ASSOCIATION, THE AMERICAN WIND ENERGY ASSOCIATION, THE SOLAR ALLIANCE, AND THE LARGE-SCALE SOLAR ASSOCIATION ON THE PROPOSED DECISION OF ALJ WETZELL**, by Electronic Mail where possible and First-Class Mail where not, on all known parties to R. 08-01-025, named on the service list attached to the original certificate of this document pursuant to the Commission's Rules of Practice and Procedure.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at Berkeley, California, Tuesday, June 9, 2009.

/s/ Christa Goldblatt

Christa Goldblatt

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