

**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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**MOTION OF
THE CALIFORNIA WIND ENERGY ASSOCIATION
TO RE-OPEN THE RECORD TO ACCEPT NERC REPORT
ON THE RESOURCE ADEQUACY VALUE
OF INTERMITTENT RENEWABLES**

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On Behalf of
THE CALIFORNIA WIND ENERGY ASSOCIATION

May 6, 2009

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In accordance with Rule 11.1 of the Commission’s Rules of Practice and Procedure, the California Wind Energy Association (CalWEA)¹ respectfully moves to re-open the record in this phase of R. 08-01-025 in order to receive into the record an important new report from the North American Electric Reliability Corporation (NERC) concerning the integration of increased amounts of intermittent renewable resources into the electric grid in North America, including the issue of the resource adequacy value of intermittent renewables.

As the Commission is aware, an important issue in this proceeding is the “counting rule” that the Commission will use to determine the contribution of California’s growing fleet of intermittent renewable generators to meeting the resource adequacy (RA) needs of the California electric utilities.² Intermittent renewables primarily use the state’s abundant wind and solar resources. The amount of wind and solar resources under contract to the utilities is growing, as the utilities seek to comply with the state’s Renewable Portfolio Standard goals. The Commission is being asked in this case to determine the methodology that the utilities will use to

¹ CalWEA is a non-profit corporation supported by members of the wind energy industry, including component manufacturers, project developers and owners, support contractors and others.

² Page 6 of R. 08-01-025 states that this case will review the “rules for counting the qualifying capacity of various resource types, including, in particular, intermittent and demand response resources.”

assess the RA value of the wind and solar generation that they purchase. The parties have proposed a number of different methodologies that produce a wide range of results for the RA value of intermittent renewables. Some of the methods proposed have been benchmarked against more complex models of the contribution of intermittent renewables to electric reliability, such as Effective Load Carrying Capacity (ELCC) studies; other proposed methods have not been so validated. Thus, the Commission will need to assess in this case whether it is important for the adopted RA counting rule to be benchmarked to these more sophisticated reliability models. Also at issue is whether the method used to assess the RA value of intermittent renewables in California should be consistent with the approaches used elsewhere in the U.S. and North America.

NERC is the organization charged with developing and enforcing the standards needed to assure the reliable operation of the electric grid in the U.S. and Canada. NERC also conducts assessments of the adequacy of electric supplies to meet anticipated demand, monitors the bulk power system, and plays a central role in auditing, training, and certifying those who operate the electric grid in North America. NERC is subject to the oversight of federal regulatory agencies in the U.S. and Canada.³ On April 16, 2009, NERC issued a special report on “Accommodating High Levels of Variable Generation,” a copy of which is attached to this motion.⁴ This report was produced by NERC’s Integration of Variable Generation Task Force (IVGTF). The report includes a section on Resource Adequacy Planning, which directly addresses and provides a recommendation concerning the methods that utilities and control area operators should use to assess the RA value of intermittent renewable resources.⁵ The NERC IVGTF Report finds that “consistent and accurate methods are needed to calculate capacity values attributable to variable generation,” and recommends the use of the ELCC approach to establishing the RA value of

³ See <http://www.nerc.com/page.php?cid=1>.

⁴ This report is also available on the NERC website at http://www.nerc.com/files/IVGTF_Report_041609.pdf.

⁵ See pages 36-42 of the NERC IVGTF Report.

intermittent renewable resources.⁶

NERC's IVTGF Report was issued on April 16, 2009, after the Commission had conducted a workshop and received opening and reply comments on the issue of the RA value of intermittent renewables. CalWEA submits that the new NERC report is highly relevant to the Commission's determination in this proceeding, as it provides a clear indication of the direction of NERC and the electric industry concerning the method that is and will be considered "best practice" and the industry standard for the assessment of the RA value of intermittent renewables. CalWEA believes that the new NERC IVGTF Report will help the Commission to reach a reasoned decision on what has been a complex and contentious issue in this case. Accordingly, CalWEA moves to re-open the record in this case for the limited purpose of accepting the new NERC IVGTF Report into the record in this proceeding.

CalWEA appreciates the Commission's prompt consideration of this motion.

Respectfully submitted,

/ s / R. Thomas Beach

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⁶ *Ibid.*, at 42.

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused to be served a copy of the foregoing document, **Motion of the California Wind Energy Association to Re-open the Record to Accept NERC Report on the Resource Adequacy Value of Intermittent Renewables**, by Electronic Mail 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, Wednesday, May 6, 2009.

/s/ Christa Goldblatt

Christa Goldblatt

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Attachment

New NERC Report from the
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