

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

Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Annual Local and Flexible Procurement Obligations for the 2019 and 2020 Compliance Years.

Rulemaking 17-09-020  
(Filed September 28, 2017)

**COMMENTS OF THE  
CALIFORNIA WIND ENERGY ASSOCIATION  
ON TRACK 2 TESTIMONY AND  
RECOMMENDATIONS FOR PROCESS, SCOPE AND SCHEDULING FOR TRACK 2**

Nancy Rader  
Executive Director  
California Wind Energy Association  
1700 Shattuck Ave., #17  
Berkeley, CA 94709  
Telephone: 510-845-5077 x1  
E-mail: nrader@calwea.org

Dariush Shirmohammadi  
Technical Director  
California Wind Energy Association  
1700 Shattuck Ave., #17  
Berkeley, CA 94709  
Telephone: (310) 858-1174  
E-mail: dariush@gridbright.com

***On behalf of the California Wind  
Energy Association***

August 8, 2018

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

Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Annual Local and Flexible Procurement Obligations for the 2019 and 2020 Compliance Years.

Rulemaking 17-09-020  
(Filed September 28, 2017)

**COMMENTS OF THE  
CALIFORNIA WIND ENERGY ASSOCIATION  
ON TRACK 2 TESTIMONY AND  
RECOMMENDATIONS FOR PROCESS, SCOPE AND SCHEDULING FOR TRACK 2**

**I. INTRODUCTION**

In accordance with the January 18, 2018, Scoping Memo and Ruling of Assigned Commissioner Randolph and Administrative Law Judge Allen (“Scoping Memo”), as modified by the August 1, 2018, e-mail ruling of Administrative Law Judge Allen, the California Wind Energy Association (“CalWEA”) submits these response comments to the July 10, 2018, Resource Adequacy (“RA”) Program Track 2 testimony filed by the parties, including recommendations for process, scope and scheduling for Track 2 of this proceeding. CalWEA responds only to comments pertaining to Effective Load Carrying Capacity (“ELCC”) issues, including those of Calpine Corporation (“Calpine”), Pacific Gas & Electric (“PG&E”), Southern California Edison Corporation (“SCE”) and the California Independent System Operator (“CAISO”).

**II. COMMENTS ON PROCESS, SCOPE AND SCHEDULE**

CalWEA agrees with testimony by CAISO (Chapter 5, p. 2), PG&E (at p. 3-10) and SCE (p. 19) that the ELCC methodology adopted in Decision 17-06-027 must be revised to address the impact of behind-the-meter (“BTM”) solar in time for the 2020 RA year. This timeline is important because the updated values will materially improve system reliability, particularly for

the summer months (CAISO Chapter 5, p.3). Moreover, as stated by SCE (p. 19), by 2020, a two-year transition period will have been accomplished. The primary issues to be addressed – i.e., those with the greatest material impact on ELCC values – are whether to treat BTM solar as a supply resource or as a load modifier and whether ELCC values should be calculated using average or marginal impacts. Issues of lesser impact on the values, such as location and technology impacts, should also be addressed for the 2020 RA year to the extent possible. The Commission should convene a workshop, if it deems necessary, in the near-term as suggested by PG&E (p. 3-9).

### **III. SUBSTANTIVE RESPONSES TO OPENING TESTIMONY**

#### **A. The Commission Should Adopt Calpine’s Proposed Methodology to Treat BTM Solar as a Supply Resource**

In its testimony, Calpine articulated two distinct approaches to the treatment of BTM solar in the ELCC methodology: one treats BTM PV as a load modifier, and the other treats BTM solar as supply. CalWEA believes that both are methodologically sound, however we agree with PG&E (p. 3-3) that treating BTM solar as a supply resource is appropriate because the mere fact that the BTM-solar resource is located on the customer side of the meter does not change its impact on system reliability. CalWEA also agrees with PG&E (p. 3-3, 3-4) that tampering with load is inconsistent with the planning standard underlying the RA program, which is based on end-use consumption, not metered load.<sup>1</sup> Calpine (p. B-1) offered an additional important argument for selecting the supply method, namely that embedding BTM solar in load profiles would effectively start the analysis from a higher level of solar penetration, and thus would treat supply-side solar as incremental to BTM solar, rather than treating BTM PV equivalently for ELCC modeling purposes. Therefore, the Commission should adopt Calpine’s proposed methodology treating BTM solar as a supply resource.

#### **B. Marginal ELCC Values Should Be Used**

SCE (section III.C) explains at length why using average ELCC values can lead to undesirable outcomes, and why adopting marginal ELCC values that establish the RA value for a

---

<sup>1</sup> CalWEA made the same point in its March 10, 2017, comments in R.14-10-010, at footnote 1.

resource for the entire life of the resource resolves these issues.<sup>2</sup> SCE also proposed workable methods of addressing resource retirements, capacity expansions, technology changes and gaming. The Commission should adopt the marginal ELCC approach with these ancillary rules. With regard to existing resources, regardless of whether the “GAM” proposal is adopted, all resources that are existing and planned before 2020 should be treated as a single vintage, with each resource in that group carrying with it the average ELCC value assigned to that group.

Finally, CalWEA agrees with SCE (p. 19) that technology and locational factors should also be adopted as part of the updated ELCC methodology, phasing in these features or using interim approaches as appropriate, depending on what current modeling capabilities and available data will allow.

Respectfully submitted,

/s/ Nancy Rader  
Nancy Rader  
Executive Director  
California Wind Energy Association  
1700 Shattuck Ave., #17  
Berkeley CA 94709  
Telephone: (510) 845-5077 x1  
Email: nrader@calwea.org

***On behalf of the California Wind Energy Association***

August 8, 2018

---

<sup>2</sup> CalWEA has been advocating this type of “vintaging” approach since its October 23, 2015, comments in the RPS proceeding.

## VERIFICATION

I, Nancy Rader, am the Executive Director of the California Wind Energy Association. I am authorized to make this Verification on its behalf. I declare under penalty of perjury that the statements in the foregoing copy of “Comments of the California Wind Energy Association on Track 2 Testimony and Recommendations for Process, Scope and Scheduling for Track 2” are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters I believe them to be true.

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

Executed on August 8, 2018, at Berkeley, California.

*/s/ Nancy Rader*  
\_\_\_\_\_  
Nancy Rader  
Executive Director  
California Wind Energy Association