

August 3, 2011

VIA ELECTRONIC MAIL

Mr. Michael Cohen Division of Ratepayer Advocates California Public Utilities Commission 505 Van Ness Avenue, 4th Floor San Francisco, CA 94102

Re: ISO Response to the DRA Data Request No. LTTP2010-CAISO-0001b

Dear Mr. Cohen:

Enclosed please find the ISO response to Data Request No. LTTP2010-CAISO-001b propounded in the Long Term Procurement Proceeding, CPUC Docket R.10-05-006.

Please do not hesitate to contact me if you have any questions.

Sincerely,

/s/ Judith B. Sanders

Judith B. Sanders Senior Counsel California Independent System Operator

cc: Service List R.10-05-006

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Integrate) And Refine Procurement Policies and) Consider Long-Term Procurement Plans)

R.10-05-006

RESPONSE OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION TO DATA REQUEST No. LTPP2010-CAISO-001b BY THE DIVISION OF RATEPAYER ADVOCATES, CALIFORNIA PUBLIC UTILITIES COMMISSION

Below are responses by the California Independent System Operator Corporation to Data Request No. LTPP2010-CAISO-001b, the Division of Ratepayer Advocates, California Public Utilities Commission.

RESPONSES

DRA has the following clarifying questions regarding its previous Data Request LTPP2010-CAISO-001(a), question 6.

Request No. 1

 Response 6.a & b indicates that "The flexibility of resources assumed by the ISO was limited to the ISO's master generation list and publicly available data from the Western Electricity Coordinating council's (WECC) Transmission Expansion Planning Policy Committee 9TEPPC) PCO model dated March 21, 2011"; however, the attached Feb 18, 2011 Market Notice provides, "The ISO is using the Western Electricity Coordinating Council/Transmission Expansion Planning and Policy Committee (WECC/TEPPC) database and modifying it where necessary to add resources that were planned to be added and retired during the model planning horizon." Please clarify which flexibility characteristics for which generation units (if any) were obtained from the ISO's master generation list rather than the TEPPC PC0 database.

ISO RESPONSE TO No. 1

The ISO 20% renewable integration study used flexibility data from the ISO's master data file. If a unit has more than one ramp rate (different ramp rate for each capacity segment), the capacity weighted average ramp rate of the unit is used in the study.The ISO 33% renewable integration study did not use any data from the ISO mater data file.

The base data of the simulation model came from the TEPPC case. Some of the data for units in California were revised based on the input from the members of the workgroup

Request No. 2

- 2. In the follow up to the CAISO's Response 6.a & b: Are the flexibility values (start times, ramp rates, minimum generation values, etc.) used in the model derived from the historical operation of units, the theoretical maximum safe vales (e.g. according to the manufacturer or owner) or some other standard? (If some other standard, please describe.)
 - a.) What is the underlying conceptual basis for the values that were used?
 - b.) If different standards were used for different classes of units (e.g. existing vs. new generation or master generation list vs. TEPPC data) please specify which standard best describes the flexibility characteristics assigned to each class of units.

ISO RESPONSE TO No. 2a

Please see answer to Question 1.

ISO RESPONSE TO No. 2b

The TEPCC case uses "generic" data for generation resources that are distinguished from each other by type of resource, technology, and vintages. TEPPC Technical Advisor Subcommittee (TAS) makes the decisions about the use of the generic data.

Request No. 3

3. As noted in question 6.c. the CAISO's May 10, 2011 presentation slide 71 indicated that five stakeholders provided feedback in response to the ISO's February 18, 2011 request. IN the archive attached to the CAISO's data request response, it appears that comments from four stakeholders were included: Calpine, Crossborder, LSA & SCE. Is there a fifth stakeholder comment, and if so, please provide these comments?

ISO RESPONSE TO No. 3

The ISO clarifies that the ISO received 5 responses from 4 stakeholders in response to the ISO's February 18, 2001 request.