

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 Procurement  
Obligations.

Rulemaking 11-10-023  
(Filed October 20, 2011)

CLEAN COALITION'S COMMENTS ON  
PROPOSED DECISION ADOPTING LOCAL PROCUREMENT OBLIGATIONS FOR  
2013 AND FURTHER REFINING THE RESOURCE ADEQUACY PROGRAM

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June 11<sup>th</sup>, 2012

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Pursuant to Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), The Clean Coalition (“Clean Coalition”) respectfully submits these comments on the Proposed Decision Adopting Local Procurement Obligations for 2013 and Further Refining the Resource Adequacy Program (“PD”).

The Clean Coalition supports the Commission’s cautious approach to re-defining flexibility in this proceeding and its goal to establish a framework for 2014 by the end of the year. We would ask that the Commission modify the PD with a firm schedule with regards to this goal. While it is not wise to rush on a critical aspect of the RA program, time is also of the essence as the state’s generation portfolio continues to change. We would also ask that the Commission make clear how it plans to integrate RA with related proceedings, including the Long-Term-Procurement Plan, the Rule 21 Interconnection Proceeding, Energy Storage and Demand Response proceedings. The availability and financial feasibility of new, non-intermittent forms of resource adequacy such as demand response and energy storage are currently dependent on the outcome of those proceedings. A clearer idea of how those proceedings might inform Phase 2 of RA would be most welcome.

The Clean Coalition is a strong supporter of the notion of demand response as a dispatchable resource. However, we are wondering how the notion of limits on the amount of

demand response per month intersects with the Commission's goal of capturing all cost effective demand response. As mentioned by EnerNOC in the previous set of comments, we would appreciate clarification on how the 5<sup>th</sup> Maximum Cumulative Capacity bucket for demand response, as proposed by the Energy Division, would be integrated with the loading order. Any additional information on how the back-up proposal will operate would also be appreciated.

Respectfully submitted,

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