

**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.

RULEMAKING 12-03-014

**FIRST DATA REQUEST OF  
COGENERATION ASSOCIATION OF CALIFORNIA TO  
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR**

**I. General Definitions and Instructions to Be Used in Responding to All Discovery Requests of CAC.**

GENERAL DEFINITIONS AND INSTRUCTIONS

A. Definitions:

- 1. Company or ISO** The California Independent System Operator, or any agents, affiliates, employees and authorized representatives thereof, or any present or previous person or persons providing advice or services to the ISO, including its agents, affiliates, employees and authorized representatives.
- 2. Document(s)** Document includes any written, typed or printed material of any kind, and material in any other medium used for preservation, duplication or recording of written or spoken words or data, whether in possession of the company or in the possession of another person. "Document" should be interpreted to include, but not limited to, the original or any copy, of any written or retrievable matter, including electronic media, or data of any kind, however produced or reproduced, to which you have or have had access. As to any document related to the matters addressed herein that is not in your possession but that you know or believe to exist, you are requested to identify or indicate to the best of your ability its present or last known location or custodian.
- 3. Study/Studies** Study includes any documents that reflect or were utilized in the collection, evaluation, analysis, summarization or characterization of information in connection with the referenced subject.
- 4. Workpaper(s)** Workpaper includes any documents, as defined above,

which reflect or were utilized in the collection, evaluation, analysis, summarization or characterization of information presented in connection with the referenced subject.

- 5. **Commission** Denotes the California Public Utilities Commission.
- 6. **Voluminous** More than two full file boxes.
- 7. **Correspondence** Should be interpreted to include, but not limited to, all letters, telexes, facsimiles, telegrams, E-mail or other electronic communication, messages, memoranda or other written communications.
- 8. **Communications** Should be interpreted to include, but not limited to, all forms of communication, whether written, printed, electronic, oral, pictorial or otherwise, including testimony or sworn statement.

#### B. General Instructions

1. Please provide your written response to this request in accordance with the following:
  - a. Label the response with the number of the question to which it responds;
  - b. State the author for the response;
  - c. Provide a telephone number for the author;
  - e. Forward responsive material as it becomes available;
  - f. State reasons for not furnishing complete responses;
  - g. Identify by date and author all responsive documents withheld; and
  - h. Furnish partial responses if complete responses cannot be furnished.
2. Please provide responses as soon as they are available. Data requests are continuing. If more recent or updated information becomes available after an initial response is provided, please forward the updated information as a supplement to the original request.
3. For each response which is claimed to be confidential, state with particularity the item designated and the complete basis, including any statutory or regulatory citations, for the claim of confidentiality. Please do not commingle claimed confidential material with non-confidential material in a response. Please provide computer spreadsheets, data files or other electronic formatted data which contain confidential material on separate IBM compatible diskettes or CDs. **Please provide all confidential material on colored paper with the words “CONFIDENTIAL MATERIAL” clearly displayed on each individual page of the document provided.**

4. Computer files are to be in or compatible with Excel 14.0 or WordPerfect 12, Microsoft Word 97-2003 or 2010 and readable in Microsoft Office 2010. Provide, on paper, a listing of the file names with a cross-reference to the data request. If necessary, for understanding the submitted data, provide on paper a record layout for any computer files. Files which compute any data values must be executable so that a change in input will result in a changed output (include all linked spreadsheets).
5. Any references to previously supplied material must be complete, including the date previously supplied, docket number, exhibit number, data request number and any necessary further identification.
6. Please provide responses to discovery via e-mail and hard copy. Discovery response should be served on the following persons:

Donald E. Brookhyser  
Alcantar & Kahl LLP  
1800 SW Fifth, Suite 1750  
Portland, OR 97201  
[deb@a-klaw.com](mailto:deb@a-klaw.com)

James A. Ross  
RCS, Inc.  
500 Chesterfield Center, Suite 320  
Chesterfield, MO 63017  
[jimross@r-c-s-inc.com](mailto:jimross@r-c-s-inc.com)

## II. Discovery Requests

- CAC-ISO-1: Referring to the May 23, 2012 Testimony of Robert Sparks (“May 23 Testimony”), p. 15, line 25, please define what renders a CHP facility “uncommitted.”
- CAC-ISO-2: Referring to the May 23 Testimony, p. 15, line 27, is it the ISO’s understanding that the CEC’s officially adopted demand forecast only includes power supplied by a CHP generator to on-site load, and that it does not include power generated by CHP that is exported to the grid?
- CAC-ISO-3: Does the ISO consider the 85 MW Watson Fifth Train CHP project at the BP Carson refinery in Carson, CA., which received its CEC siting certificate in April 2012, to be “uncommitted?”
- CAC-ISO-4: What is the effectiveness factor of the Watson generation project, and in particular the Fifth Train facility, to meet the identified transmission constraints in the LA Basin as identified in the LCR study?
- CAC-ISO-5: What is the effectiveness factor of the BP Wilmington Calciner generating facility to meet the identified transmission constraints in the LA Basin as identified in the LCR study?
- CAC-ISO-6: Referring to the ISO’s 2011 Transmission Plan, p. 215, was the Fifth Train at the Watson facility in Carson, CA, included in the study base cases?