

**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)

**NOTICE OF *EX PARTE* COMMUNICATION OF THE  
THE ALLIANCE FOR RETAIL ENERGY MARKETS**

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Consultant to  
**ALLIANCE FOR RETAIL ENERGY MARKETS**

August 15, 2012

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Pursuant to Rule 8.4 of the Commission’s Rules of Practice and Procedure, the Alliance for Retail Energy Markets (“AReM”) <sup>1</sup> provides this notice of *ex parte* communication with Ms. Sara Kamins, Advisor to Commissioner Mark J. Ferron. Ms. Kamins initiated the meeting, which took place by teleconference on August 10, 2014 from approximately 10:00 a.m. to 10:35 a.m. Attendees for AReM were: Sue Mara, RTOAdvisors, L.L.C., consultant to AReM; Mary Lynch, Vice President, State Government Affairs, Exelon Corporation; Ms. Kristy Ashley, Director, Market Development, Exelon Corporation; Mr. Greg Bass, Director, Noble Americas Energy Solutions LLC; Ms. Andrea Morrison, Director, Government and Regulatory Affairs, Direct Energy Services, LLC; Ms. Amanda Bergfield, Retail Analyst, Direct Energy Upstream; and Mr. Ja y Robertson, Senior Manager, Retail Procurement, Direct Energy Upstream. The discussions included only oral communications and concerned AReM’s views on key policy issues for the Commission to consider in integrating flexible capacity requirements into its Resource Adequacy (“RA”) program, such as administrative simplicity, commercial feasibility,

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<sup>1</sup> AReM is a California non-profit mutual benefit corporation formed by electric service providers that are active in the California’s direct access market. This filing represents the position of AReM, but not necessarily that of a particular member or any affiliates of its members with respect to the issues addressed herein.

and the potential for the exercise of market power and ways to mitigate it. AReM's representatives recommended that the goals of the California market should be to maximize the value of the generation assets captured in the energy and ancillary services markets and to minimize out-of-market types of capacity procurement. Finally, AReM's representatives requested that the Commission carefully manage the interplay between the RA and Long -Term Procurement Plan (R.12-03-014) proceedings so that RA obligations for load-serving entities are clearly addressed only in the RA proceeding.

Respectfully submitted,

A handwritten signature in black ink that reads "Sue Mara". The signature is fluid and cursive, with the first letters of "Sue" and "Mara" being capitalized and prominent.

Sue Mara  
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