

**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
(Filed March 22, 2012)

**DISTRIBUTED ENERGY CONSUMER ADVOCATES
COMMENTS IN RESPONSE TO THE ASSIGNED COMMISSIONER'S RULING ON
THE REVISED STANDARDIZED PLANNING SCENARIOS**

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COMMENTS IN RESPONSE TO THE ASSIGNED COMMISSIONER’S RULING ON
THE REVISED STANDARDIZED PLANNING SCENARIOS**

Distributed Energy Consumer Advocates (“DECA”) hereby files comments in R.12-03-014 in response to Commissioner Florio's rulings of September 20 and 25, 2012.

I. Background

DECA is a nonprofit California public benefit corporation that advocates on behalf of its members and their broader customer class that either currently produce and consume electricity, or consume electricity and are considering producing it as well. DECA seeks to promote the optimal regulatory climate and market in which its members and others may invest in distributed clean energy infrastructure, without preference to any single technology. DECA's comments here focus on the narrow issue of considering local area need that do not first rely on generation capacity to meet voltage support constraints.

II. DECA's Comments

DECA comments on a concern based on its understanding that the local capacity requirements modeled as requiring generation to meet them may reflect the assumption that voltage support constraints can only be met by generation resources. DECA believes that the CAISO has demonstrated in its SONGS outage mitigation efforts that tools other than generation can effectively address these constraints. In particular DECA points to the use of shunt capacitors and synchronous condensers which can be relatively easily modeled by the CAISO or others in this proceeding. Alternatively, LCR studies could be run with the voltage constraint “turn off” to better judge the lower end of capacity need in local areas. This issue is of particular concern to DECA in the Once Through Cooling-heavy LA Basin local area, but may apply

elsewhere. DECA believes that lower local capacity requirements may increase the ability and willingness of the Commission to consider alternatives to large fossil plants such as aggregated distributed generation to meet the local capacity need.

Unfortunately DECA does not at this time have the ability to perform such studies on its own and so it here asks the Commission to consider this issue in some capacity in this proceedings. In addition to the potential benefits to small scale distributed generation owners, such revisions may result in significant reductions in capacity expenses, overall lower emissions, and a reduction in the cost of air permits in the LA Basin that will ultimately be born by ratepayers.

III. Conclusion

DECA hereby files its comments in R.12-03-014 in response to the Assigned Commissioner Rulings of September 20 and 25, 2012.

Respectfully submitted this 5th day of October, 2012.

By

/s/

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