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 ON THE PROPOSED DECISION ADOPTING STANDARDIZED PLANNING ASSUMPTIONS AND SCENARIOS

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DISTRIBUTED ENERGY CONSUMER ADVOCATES
COMMENTS ON THE PROPOSED DECISION ADOPTING STANDARDIZED PLANNING ASSUMPTIONS AND SCENARIOS

Distributed Energy Consumer Advocates ("DECA") hereby files comments in R.12-03-014 on Administrative Law Judge Gamson's Proposed Decision Decision Adopting Long-Term Procurement Plans Track 2 Assumptions and Scenarios ("the PD").

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 needs that do not include an assumed reliance on generation capacity to meet voltage support constraints.

II. DECA's Comments

DECA's comments on the PD are based on the fact that neither the CAISO nor any investor-owned utility disputed DECA's characterization in its October 5, 2012 comments on the that the local capacity requirements used in the LTPP have been modeled with the incorrect assumption that generation resources as opposed to non-generation resources are required to meet voltage support constraints in the establishment of capacity requirements in local areas. DECA proposes that the Commission require all parties involved with the generation of Local Capacity Requirements to model a "non-generation source of voltage support" run for all scenarios in order to properly model the actual low end of generation resources required for grid

stability. As stated in its previous comments, DECA believes that the CAISO has demonstrated in its SONGS outage mitigation efforts that tools other than generation can effectively address some of these voltage constraints.[1] DECA proposes the Planning Assumptions be lowered by the difference in the number of MW of local need based on LCR studies run with the voltage constraint "turned off" or, at a minimum, that a sensitivity be run with the lower need level.

The failure of the PD to separate the CAISO's preferred "generation first" solution to the need for voltage support from alternatives, especially non emissive alternative "bakes in" a fundamental disregard for the preferred loading order. Similarly, any capacity authorization that does not consider the ability of lower cost alternatives for provision of voltage support than new generation resources burdens all ratepayers, and especially those proximate to pollution sources.

III. Conclusion

DECA hereby files its comments in R.12-03-014 on the proposed decision adopting standardized assumptions and scenarios for the Long Term Procurement Planning proceeding.

Respectfully submitted this 10th day of December, 2012.

By */s/*
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[1]In its October 5, 2012 comments DECA pointed to the use of shunt capacitors and synchronous condensers which the CAISO itself modeled in its SONGs outage studies.