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Bcc:

Subject: RE: R.11-10-023, Request to schedule additional workshop

Judge Gamson,

The Sierra Club also supports TURN's request for an additional workshop prior to additional comments being due. Party comments, including those raised by the Sierra Club and the Vote Solar Initiative in our December 26th comments, on the need and design of Flexible Capacity Procurement have yet to be addressed and should be discussed at a workshop prior to the submission of further comments. The Sierra Club has submitted a data request to the ISO to better understand how the supply and demand of and for flexible resources will change over time. ISO had delayed its response to this data request until it has updated its analysis. Once this updated analysis is complete, it should be subject to vetting at a workshop so parties can better understand the nature and extent of the need for flexible capacity and develop appropriate solutions. Importantly, new data and analysis by the ISO should be made available to parties well in advance of a workshop, and not the morning of that workshop as was the case on January 23rd. This type of practice thwarts meaningful participation by parties and effective use of workshop time.

Assuming flexible capacity procurement is needed, additional discussion is merited on program design that would allow preferred resources like energy storage and demand response to meaningfully participate and a mechanism that would differentiate between low and high carbon solutions to flexible capacity to ensure that any flexible capacity procurement program adopted by the Commission aligns and furthers California's near and long term greenhouse gas reduction targets. Because flexible capacity procurement is not needed for 2014, there is no legitimate basis to delay these discussions until after adoption of an "interim" proposal that excludes these important design considerations.

Thank you,

Matt Vespa

On Tue, Feb 12, 2013 at 12:26 PM, Pak, Alvin <APak@semprautilities.com> wrote:

Judge Gamson,

San Diego Gas & Electric Company supports the informal recommendation of counsel for TURN below to schedule another workshop in this proceeding. We believe this would assist us in submitting more informed and helpful comments in this phase of the proceeding, particularly with respect to the promised revisions that might be made to the Energy Division proposal. Additionally, to the extent new data and information might be available and useful in assisting the parties to understand the Joint Parties' proposal, holding another workshop where such information would be presented could be useful to those parties in the same way. In many respects, the consideration of how the California ISO's identified need for resources with flexibility attributes is the most important topic the Commission has confronted since the original, basic structure of the California resource-adequacy program was adopted, and we believe a thorough vetting of the possible alternatives by which the Commission might address the ISO's needs should be facilitated in this proceeding. SDG&E acknowledges the need for expedition in this matter, but we strongly believe a workshop could be scheduled to accommodate that need.

Alvin S. Pak

Counsel for San Diego Gas & Electric Company

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----- Original Message -----

Subject: R.11-10-023, Request to schedule additional workshop

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Dear ALJ Gamson,

First, I would like to inform you that I will be taking over the attorney responsibilities in this case from Hayley Goodson. I look forward to working with you and the parties.

Second, TURN would like to offer a procedural recommendation in response to your notice last Thursday that comments were being delayed until March, after

Energy Division (ED) produces a revised flexible capacity proposal. Specifically, TURN urges the scheduling of a workshop for the parties to explore ED's revised proposal before the comments are due. The workshop and comment schedule should be coordinated to give parties adequate time to review the new ED proposal before the workshop and to prepare comments after the workshop.

Further, TURN understands that in the upcoming weeks, CAISO will be generating updated data relating to the need for the Joint Parties' proposal. In addition, TURN believes there is still a need to review other aspect of the Joint Parties' proposal (some of which parties raised in their December 26 Phase 2 comments). Additional workshop time is warranted to address these matters too. Again, TURN would request that the workshop be scheduled to allow sufficient time before the workshop to review the updated CAISO data.

We appreciate the challenges the Commission faces in addressing the issues related to a new flexible capacity requirement. We offer these recommendations in the spirit of enabling the Commission to develop the necessary record on these issues as efficiently as possible.

Sincerely,

Tom Long
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