

From: Tom Long

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Cc: Kevin Woodruff (kdw@woodruff-expert-services.com)

Bcc:

Subject:

To Parties on the Service List for R.11-10-023:

Below please find TURN's informal comments on the draft Energy Division Draft Staff Proposal dated September 13, 2013.

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Begin forwarded message:

From: "Kevin Woodruff" <kdw@woodruff-expert-services.com>
Date: October 22, 2013 3:56:55 PM PDT
To: <joanna.gubman@cpuc.ca.gov>
Cc: "Tom Long" <tlong@turn.org>
Subject: TURN's Informal Comments

Joanna,
TURN offers the following informal comments in response to Energy Division's proposed methodologies for computing "Qualifying Capacity and Effective Flexible Capacity Calculation" presented at the October 15 workshop in R.11-10-023.

TURN appreciates Energy Division's (ED's) desire to evaluate both Effective Load Carrying Capability (ELCC) and Effective Ramping Capacity (ERC) using consistent methods and data and the considerable thought ED has already given the matter. Given the history of the concept of ELCC in the industry and the availability of commercial software products designed to compute ELCC, TURN believes ED should be able to compute ELCC with reasonable effort pursuant to its work plan.

However, TURN believes ED is embarking into uncharted waters in trying to assess ERC using the same models and methods. TURN has no doubt that ED and other parties will learn much about ERC-related issues during the ED's upcoming efforts, but cautions against expecting that implementable results will be achieved within the few months apparently allotted for the project.

For example, certain concepts within the ERC study bear special attention. For example, to TURN's knowledge, the concept of "Loss of Ramping Expectancy" (LORE) is entirely new and its relationship to actual loss-of-load and reliability planning in general is not clear. This and possibly other concepts will need to be explored in more detail.

More generally, significant review of modeling inputs, methods and results, including diagnostic and intermediate results, will be necessary to assess computations of ERC. These steps are always necessary in such modeling exercises, but are even more important when computing a new and unfamiliar value such as ERC.

Finally, one concept common to both the ELCC and ERC computations is the "perfect generator". It may be reasonable to set resources' ELCC and ERC in comparison to such a perfect generator. However, given the monetary value that ELCC and ERC results may provide resource owners, it may be unfair to compute some resources' ELCC and ERC using ED's proposed model and setting other resources' ELCC and ERC using other methods. Though TURN understands it is possible that all resources' ELCC and ERC may someday be computed using the same method, until that date some adjustment may be necessary to ensure all resources' capacity values are treated comparably.

Thank you for your time and consideration.

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