Docket No.: R.13-09-011

Exhibit No.: _____

Date: May 22, 2014

Witness: Sue Mara

REBUTTAL TESTIMONY ON BEHALF OF THE DIRECT ACCESS CUSTOMER COALITION AND ALLIANCE FOR RETAIL ENERGY MARKETS

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I. INTRODUCTION AND SUMMARY

Q: Please state your name.

A: My name is Sue Mara.

Q: Did you submit testimony in this proceeding on May 6, 2014 on behalf of the Direct Access Customer Coalition ("DACC") and the Alliance for Retail Energy Markets ("AReM")?

A: Yes.

Q: Please summarize your rebuttal testimony.

A: I summarize my rebuttal testimony as follows:

- A number of parties concur that demand response ("DR") programs perform functions similar to generation or are substitutes for procurement of generation. Generation and procurement-related costs are properly recovered from bundled customers through generation rates, with bundled customers retaining all the benefits of that procurement. Cost allocation for utility DR programs must be consistent across the investor-owned utilities ("IOUs"), as noted by the Office of Ratepayer Advocates ("ORA").
- This is the proper proceeding and the proper time in which to establish cost allocation principles that will be applied by the IOUs when requesting approval of DR program costs.
- The workshops on cost allocation requested by San Diego Gas & Electric Company ("SDG&E") and the California Large Energy Consumers Association

("CLECA") are unneeded and will only further delay a decision; the requests should therefore be denied.

- The IOUs' costs associated with procurement through the proposed Demand Response Auction Mechanism ("DRAM") of Resource Adequacy ("RA") capacity from DR resources are also properly recovered from bundled customers through generation rates, with bundled customer retaining all the benefits of that procurement. Each LSE has its own RA capacity requirements to meet.
- The Commission should reject proposals by which the IOUs would procure DR on behalf of non-bundled customers with CAM-like or shared cost recovery. If, despite the fact that there is no statutory authority for imposing a DR obligation on non-utility Load-Serving Entities ("LSEs"), the Commission decides to consider a DR procurement obligation for non-utility LSEs, I recommend the Commission initiate a separate phase of this proceeding to fully vet associated legal issues and implementation details.

II. COST ALLOCATION

Q. Did parties concur that DR programs perform functions similar to generation or are substitutes for procurement of generation?

A. Yes. A number of parties reached this conclusion. For example, Mr. Sudheer Gokhale, the witness for ORA, noted that the benefits of DR programs "primarily accrue to customers in the form of reduced generation costs."[1] A witness for Pacific Gas and Electric Company ("PG&E"), Mr. Kenneth E. Abreu, explained that PG&E procures

[1] ORA, p. 17.

supply-side DR to meet its "LSE's obligations" and having DR as a "tool" in its portfolio allows a "more robust portfolio." [2] As Mr. Abreu summarized:

> The IOUs' role in competitively procuring DR should be analogous to their role in *procuring generation resources*. *The utilities currently conduct the procurement of generation and manage the contracts, and they should similarly be able to do the same for DR*. (emphasis added)[3]

Mr. Raymond Johnson, a witness for Southern California Edison Company ("SCE"), argued that the IOUs should continue to be able to provide DR services directly to its bundled customers, because they provide *generation* for those bundled customers.[4]

In addition, SCE's witness Aldrich argued that SCE would logically recover the costs of Supply Resource DR obtained from a third-party DR provider through generation rates because the DR supply *offsets* generation:

> For example, if SCE is procuring a Supply Resource from a third-party provider that offers its service to *all* types of customers, SCE may need to modify its cost recovery approach and apply costs only through Generation rates *because the Supply Resource would be treated as an offset to Generation*. (emphasis added)[5]

Mr. Steven Moss, the witness for the Environmental Defense Fund ("EDF"), noted that progress has been made by the Commission in providing RA credits to Supply Resource DR, so that it "can be procured more akin to generation.[6] And the Joint Demand Response Parties argued that DR participation can be encouraged if the payment structures "are more aligned with how other resources are paid."[7]

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[2] PG&E, Witness Abreu, p. 4-15.
[3] Ibid.
[4] SCE. Witness Johnson, p. 23: "Also, because SCE provides generation for its bundled customers, it should have the authority to provide DR services directly to those customers."
[5] SCE, Witness Aldrich, p. 45.
[6] EDF, p. 17.
[7] Joint DR Parties, p. 3.

Q. What do you conclude from these testimonies that acknowledge DR as functionally similar to generation?

A. These testimonies completely align with mine, in which I pointed out that DR resources are used by the IOUs to meet their generation and procurement obligations or to provide electric services solely to their bundled customers – all of which are LSE obligations.[8] As a consequence, the associated costs must be recovered from bundled customers through generation rates, with bundled customers retaining the entire RA benefit associated with the DR programs that confer RA. Put simply, parties cannot credibly argue that DR helps IOUs meet their own LSE procurement obligations for their bundled customers, but then suggest that nevertheless the associated costs should be recovered from both bundled and non-bundled customers though distribution rates. Such a conclusion is completely unsupported by cost-causation principles followed in utility ratemaking and the testimony and facts presented by the parties in this proceeding.

Q. Pacific Gas and Electric Company states that DR is a "customer service" function and that the costs should therefore be recovered through distribution rates. Do you agree?

A. No. PG&E's witness, Mr. Steve R. Haertle, argued that it is appropriate to continue to recover DR program costs through distribution rates, noting that DR programs are "customer-service related," because they support programs that enable customers to reduce their electricity costs by reducing peak demands.[9] This is a convoluted line of reasoning that has no merit and, moreover, conflicts with the testimony of PG&E's other

[8] DACC-AReM Testimony, p. 21.
[9] PG&E, Witness Haertle, p. 8-3.

witness, Mr. Ken Abreu, who testified (as noted above) that procuring DR was analogous to procuring generation resources. Mr. Haertle offers no justification for categorizing DR programs to be "customer-service related" or why it would be reasonable to recover the associated costs through distribution rates, even if such a categorization could be justified in the first instance.

In fact, DR programs do not provide a service to customers; rather, they allow customers to provide a procurement service to the utility. To participate in a DR program, customers change their normal operating pattern—raising thermostats, shutting down a production line, deferring some normal activity, often at a cost (be it financial or inconvenience). In exchange for customers taking extraordinary action and by doing so reducing their demand during specific periods, the DR program sponsor provides compensation to those customers. The customer is providing a service—reduced load—to the LSE, not the other way around, and being paid for it. As such, DR cannot reasonably be seen as a "customer service."

Mr. Haertle also explains that PG&E's administration of its DR programs has always resided in the Regulatory Affairs or Customer Care organizations within PG&E, and not within the energy procurement functions of the company.[10] First and foremost, the internal administrative structure that PG&E chooses to oversee its DR activities is irrelevant to proper cost allocation. What *is relevant* is the function performed by the DR program and DR performs a generation- or procurement-related function. Second, the Commission has already determined that any customer-service costs related to the procurement function must be recovered through generation rates in its foundational

[10] Ibid.

decision ordering unbundling of the utilities rates into generation, transmission and distribution rates:

> With the introduction of direct access, utility distribution customers will continue to require a high level of customer service with attendant funding requirements. The matter for resolution here, however, is whether and the extent to which the cost of that service is appropriately assigned to distribution revenue requirements. We share TURN/UCAN's concern that the utilities have allocated more than a fair share of customer service and marketing costs to distribution. … We therefore reduce the utilities' distribution revenue requirements to reflect customer service and marketing costs that are more appropriately allocated to generation.[11]

In conclusion, when DR activities are primarily performing generation- or procurement-related functions, as my testimony has demonstrated, any associated costs, customer-service related or otherwise, must be incorporated into generation rates.

Q. Did parties support addressing cost allocation consistently for all three IOUs in this proceeding?

A. There was some difference of opinion on this point. The witness for ORA, Mr. Gokhale, agreed that the current cost allocation of utility-run DR programs was inconsistent, with the same or similar DR programs run by different utilities having differing cost recovery. He recommended that the Commission examine cost allocation mechanisms in this proceeding and require "consistency" among the utilities.[12] As mentioned in my opening testimony,[13] the Commission reached this same conclusion regarding the need for consistency in Decision ("D.") 12-04-045 and determined that proper cost allocation should be addressed in a DR policy rulemaking.[14] This is that rulemaking.

[11] D.97-08-056, p. 26.
[12] ORA, p. 17.
[13] DACC-AReM, p. 8.
[14] D.12-04-045, p. 204.

However, several other parties questioned the Commission's determination that consistent cost allocation for the utilities be examined in a DR policy proceeding. For example, Ms. JoAnne Aldrich, witness for SCE, asked the Commission to "refrain from establishing a strict method" for DR cost recovery of bifurcated DR programs, so as not to "prejudge all future DR applications."[15] Ms. Athena Besa, a witness for SDG&E, recommended that cost allocation for utility-run DR programs be addressed in proceedings that "consider broad policy implications collectively in a comprehensive forum."[16] As examples, Ms. Besa proposed that DR cost allocation would be (or would have been) appropriate topics to take up in the Residential Rate Reform Order Instituting Rulemaking ("OIR") (R.12-06-013) or the recently concluded Track 4 of the Long-Term Procurement Plan ("LTPP") proceeding (R.12-03-014), which addressed replacement of the San Onofre Nuclear Generating Station ("SONGS").

I completely disagree. SCE's request to retain flexibility to establish cost recovery with each DR application will do nothing more than pave the way for unending litigation and re-litigation, and as such, would be highly inefficient and wasteful of resources. SDG&E's proposal for moving the cost recovery questions to other proceedings is equally misplaced. The Residential Rate Reform OIR does not include cost allocation within scope and addresses only rate design for residential customers – a narrow scope. The Track 4 LTPP was also a narrow proceeding addressing replacement of a closed power plant in Southern California. Proper and consistent cost allocation policies for all utility-run DR programs are not appropriate issues for consideration in either one and would not have complied with the Commission's directives in D.12-04-

[15] SCE, p. 45.
[16] SDG&E, Witness Besa, p. AB-6.

045, which required that cost allocation be considered in a DR policy OIR "in a consistent manner across all three utilities" to "establish overall rules" and to apply those rules "in the Utilities' respective rate design applications."[17]

I concur with the approach set forth by the Commission in D.12-04-045. Setting uniform principles that apply consistently to all three utilities will ensure utility DR programs are competitively neutral and consistent throughout the state. Moreover, as long as the IOUs have complied with the Commission-approved uniform cost allocation principles, parties would no longer be required to address this contentious issue in litigation in multiple proceedings. I recommended specific cost allocation principles for the Commission to adopt in this proceeding in my opening testimony.[18]

Q. Do you support holding workshops to see if parties can reach agreement on proper cost allocation for the DR programs run by the IOUs?

A. No. Dr. Barbara Barkovich, the witness for CLECA, and SDG&E's witness Besa, recommended that the Commission sponsor workshops to work through cost allocation issues and related policy concerns. First, Dr. Barkovich recommends that a "set of workshops" be convened to see if representatives of the LSEs can arrive at a "mutually agreeable solution" to cost allocation.[19] I respectfully but strongly disagree with her recommendation. DACC and AReM, separately or collectively, have been seeking a Commission decision to address accurate, fair and competitively-neutral cost allocation of the IOUs' DR programs since 2004, but the Commission has either not ruled on the

[17] D.12-04-045, p. 204.
[18] DACC-AReM, pp. 14-21.
[19] CLECA, p. 46.

request or simply chosen to defer a decision.[20] The positions of the parties have not materially changed over the years and I see nothing fruitful to be gained from workshops on the topic.

Second, SDG&E witness Besa's testimony with respect to the need for workshops should be disregarded. She states:

> To the extent that both utilities and third parties offer DR solutions to customers in retail markets, SDG&E recognizes the need for the adoption of reasonable rules to prevent cross subsidization and ensure a level playing field. To the extent parties have concerns that existing rules do not adequately address this issue, SDG&E recommends that their concerns be addressed through workshops.[21]

I completely concur with Ms. Besa's sentiment that there is a need for rules to "prevent cross subsidization and ensure a level playing field." That is the primary reason DACC and AReM engaged in this proceeding and why I have proposed DR cost allocation principles that will be accurate, fair and competitively neutral. However, the suggestion that the Commission should hold workshops to determine whether any parties have concerns about cost allocation methodologies will simply further delay any meaningful resolution of these issues. Put simply, SDG&E prefers the existing cost allocation methodologies to stay in place,[22] while DACC, AREM and others want those cost allocation methodologies significantly changed. The Assigned Commissioner and Administrative Law Judge identified cost allocation as a "foundational issue" for Phase Two of this proceeding in the November 14, 2013 Scoping Memo[23] at the request of

[20] See discussion of earlier requests by DACC and AReM for proper cost allocation of IOU-run DR programs in the testimony filed by DACC and AReM in A.11 -03-001 *et al*, June 15, 2011, pp. 14-15.
[21] SDG&E, Witness Besa, p. AB-5.
[22] SDG&E, Witness Besa, p. AB-5.
[23] Joint Assigned Commissioner and Administrative Law Judge Ruling and Scoping Memo, R.13-09-011, November 14, 2013, p. 9.

DACC and AReM. There is no mystery that an issue exists and no need to discuss it in workshops. SDG&E's request for workshops on this topic should be rejected.

That the call for workshops by SDG&E is little more than a delay tactic is supported further by the fact that, SDG&E also advocates that cost allocation policies should really be addressed in other proceedings, as noted above, such as the LTPP or Residential Rates proceedings, neither of which is an appropriate venue for these issues, as I have explained.[24] SDG&E's suggestions appear to be intended to avoid dealing with the issue altogether and maintain the *status quo* of improper cost allocation. Moreover, if an attempt were made to address DR cost allocation issues in the scope of either of those proceedings, parties would undoubtedly argue that DR cost allocation policy issues should be dealt with in a DR proceeding.

In summary and as explained in my opening testimony, this is the proper proceeding and the proper time for the Commission to decide on accurate, fair and competitively-neutral cost allocation for the IOUs' DR programs. The Commission will have sufficient information on the record to render its determination without holding workshops on the matter.

Q. Do you wish to comment on your understanding of SCE's current cost allocation method for DR?

A. Yes. I noted in my opening testimony that SCE did not address cost recovery in its March 3, 2013 Bridge Funding request.[25] SCE provided greater detail on its cost recovery in its opening testimony.[26] In particular, SCE finds the current DR cost

[24] SDG&E, Witness Besa, p. AB-6.
[25] DACC-AReM, p. 10.
[26] SCE, Witness Aldrich, pp. 43-45.

recovery policy adopted for SCE to be sufficient and equitable.[27] My understanding is that the primary cost recovery criteria SCE uses is customer eligibility. If the program is open to direct access customers, the costs associated with the program are recovered through distribution-related accounts so that direct access customers pay. If the program is not open to direct access customers, then the costs of that program are recovered through generation-related accounts.

While this is preferable to indiscriminately assigning all DR program costs to direct access customers, the approach fails to accurately assign all costs where they truly belong – in generation rates as procurement costs. SCE-run DR programs allow customers to provide procurement -- a service to SCE. Differentiating cost recovery based upon the provider of the procurement service is inappropriate. Procurement costs, no matter the provider, should be collected though generation rates.

In fact, bundled and direct access customers participating in utility-run DR programs are providing a resource to the utilities and should be treated like any other resource provider and paid appropriately for that resource. Similarly, the costs of these DR resources must also be treated like other procurement-related costs and recovered through generation rates paid for by the bundled customers. The associated benefits, such as RA allocations, accrue to those same bundled customers, who pay for the DR procurement through their generation rates.

Q. Do you have any final comments on cost allocation?

A. Yes. Recovering utility-run DR program costs through distribution rates or other non-bypassable charges undermines competitive markets, discourages participation in DR

[27] SCE, Witness Aldrich, p. 45.

markets by competitive third-party providers, and confers an unfair competitive advantage on the IOUs. I have proposed cost allocation principles in this proceeding that would remedy this inequitable situation and apply uniformly to each of the IOUs.[28] They are summarized as follows:

- Supply Resource DR is integrated into the CAISO's wholesale energy markets,[29] thereby performing the same function as generation resources and the associated costs must be recovered the same way as costs are recovered for generation resources – through generation rates.
- Load Modifying Resource DR "reshapes or reduces the net load curve"[30] and the associated costs should be allocated depending on: (a) the customers to whom the program is available and applicable; and (b) whether the program functions as a substitute for generation by providing a RA capacity credit or other generation-like function, such as peak-shifting. Specifically, Load Modifying DR programs that are (a) solely available and applicable to bundled utility customers and/or (b) function as a substitute for generation must be recovered through generation rates.
- Finally, when DR costs are properly recovered from bundled customers through generation rates, bundled customers should retain all the benefits of that procurement.

Once adopted, the IOUs would be required to comply with these cost allocation principles for all of their DR programs and procurement. Setting such uniform principles

[28] DACC-AReM, pp. 14-22.
[29] D.14-03-026, Ordering Paragraph 3, p. 28.
[30] D.14-03-026, Ordering Paragraph 2, p. 28.

will ensure utility DR programs are competitively neutral and consistent throughout the state, as well as encourage participation in the DR market by third-party providers. I recommend that the Commission adopt my proposals and move forward with rapid implementation. Improper cost allocation has been in place for more than a decade and now is the time to correct this long-standing inequity.

Q. Is there any justification for allocating the costs associated with IOU procurement using the proposed DRAM in any manner other than through the utilities' generation rates?

A. No. DRAM is being proposed as a mechanism by which the IOUs would competitively procure RA from DR resources aggregated by DR Providers. As such, this is performing a procurement function to meet the IOU's RA requirements and the associated costs belong in generation rates. All LSEs have RA requirements to meet for their own customers. The DRAM would be one way the IOUs could meet their RA requirements and the associated RA capacity credit should apply solely to the bundled customers.

Q. Did any party address cost allocation for DRAM procurement?

A. Yes. SDG&E's witness Besa explained that, if DRAM procurement is approved by the Commission, the costs of acquiring the RA capacity should not be recovered through SDG&E's existing distribution-rate mechanism. However, she did not offer a proposed alternative cost allocation mechanism.[31] Nonetheless, SDG&E recognizes that cost allocation mechanisms must be reviewed and established as part of this proceeding. DRAM procurement that involves RA capacity should have its costs recovered through generation rates.

[31] SDG&E, Witness Besa, footnote 1, p. AB-5.

III. DR PROCUREMENT OBLIGATION FOR NON-IOU LSES

Q. Did some parties propose that non-utility LSEs should be obligated to procure DR?

A. Yes. Witnesses for both SCE and SDG&E argued that non-utility LSEs should have the same DR procurement obligations as the IOUs. Mr. David Barker, SDG&E's witness, stated that non-IOUs "should have the same obligations as the IOUs to procure DR RA capacity."[32] SCE's witness, Mr. Carl Silsbee, argued that IOUs and non-IOUs "should be treated the same," and that a DRAM procurement obligation is "consistent with how RPS and energy storage mandates are assigned and may be appropriate for resources that are procured to meet policy objectives rather than system needs."[33] Also, Mr. Kevin Woodruff, the witness for The Utility Reform Network ("TURN"), makes a similar argument regarding utility procurement to meet state policy goals.[34]

Q. How do you respond?

A. There is no statutory requirement for the IOUs to obtain any portion of their procurement from DR resources. Instead, to date the Commission has authorized utility-run DR programs under its general regulatory authority and the utilities are assured full recovery of their costs to operate the programs. There is also no statutory authority for the Commission to approve non-utility LSE procurement. Public Utilities Code Section 394(f) in fact specifically enjoins the Commission from regulating, "rates or terms and conditions of service offered by electric service providers."

[32] SDG&E, Witness Barker, pp. DTB-9 – DTB-10.
[33] SCE, Witness Silsbee, p. 41.
[34] TURN, Witness Woodruff, p. 13.

Nor is there a statutory requirement that the Commission treat non-utility LSEs the same as the IOUs with regard to DR issues.[35] In short, there is no statutory basis for the IOUs' requests to impose a DR procurement requirement on non-IOU LSEs.

Q. Did parties also propose a DR procurement obligation for non-IOUs as an option for addressing cost allocation?

A. Yes. CLECA's witness Barkovich[36] and TURN's witness Woodruff[37] both argued that imposing a DR procurement obligation on non-utility LSEs was one option for addressing cost allocation. Dr. Barkovich noted, however, that the Commission has no jurisdiction to impose a DR procurement obligation on non-IOU LSEs and proposed, as an alternative, cost-sharing of DR procurement by all LSEs with the best DR programs chosen from a "pool" or through an auction.[38] Mr. Woodruff proposed a "CAM-like" mechanism to recover the DRAM procurement costs from all customers if the Commission decided not to impose a DR procurement obligation on non-IOU LSEs.[39]

Q. How do you respond to proposals to apply shared cost recovery or a CAM-like mechanism to DR procurement by the IOUs?

A. DACC and AReM strongly oppose any shared cost recovery or use of the CAM or any "CAM-like" mechanism to recover the costs of utility-run DR programs, including recovering DR costs through non-bypassable distribution charges as is done today. First, DR procurement is ineligible for CAM treatment. The Commission has authority to

[35] Public Utilities Code Section 365.1(c)(1) refers to the "same requirements" for IOUs and ESPs only with respect to RA, Renewable Portfolio Standards and Greenhouse Gas.
[36] CLECA, p. 46.
[37] TURN, Witness Woodruff, p. 13.
[38] CLECA, p. 46.
[39] TURN, Witness Woodruff, p. 13.

approve CAM only under certain restrictive circumstances,[40] which do not apply to procurement of DR either separately or through the DRAM. Second, procurement by the IOUs "on behalf of" direct access customers though a "CAM-like" mechanism or other non-bypassable charge, such as recovery though distribution rates, raises significant competitive concerns, which have been well documented in other proceedings and were highlighted in my testimony[41] as well as by Mr. Jeremy Waen, the witness for Marin Clean Energy ("MCE").[42] In short, improper recovery of generation-related costs through distribution rates or other non-bypassable charges is inaccurate, unfair, and anti-competitive, and compromises the ability of direct access customers to participate in programs designed by their ESPs and third-party DR providers. As a result, the Commission's goals for expanded DR participation would be similarly compromised. Instead, the utility DR programs should have their costs recovered through generation rates, and when direct access customers choose to participate in the utility programs and get paid for doing so, the RA benefits that the DA customers' participation confers should accrue solely to the utilities' bundled customers.

Q. Is there an alternative to DR procurement by the IOUs on behalf of non-bundled customers?

A. An alternative to "on behalf of" DR procurement is necessary only if the Commission should determine that it is appropriate to impose DR procurement obligations on both the IOUs and non-utility LSEs. If, despite the lack of statutory authority, the Commission is choosing between (a) "on behalf of" procurement by the IOUs with CAM-like non-

[40] Public Utilities Code Section 365.1(c)(2).
[41] DACC-AReM, pp. 11-14.
[42] MCE, pp. 5 and 8.

bypassable charges or (b) a directly-imposed DR procurement requirement on the non-utility LSEs, I would recommend the directly-imposed DR procurement requirement and reject any "on behalf of" CAM-like procurement. If the Commission is convinced in this phase of this proceeding that it should consider imposing a direct DR obligation on non-utility LSEs, the full vetting of such an approach should be scheduled for inclusion in a future phase of this proceeding. This separate phase could address the myriad issues that would accompany such a proposal, including (i) a determination of the Commission's legal authority to pursue this approach, (ii) the appropriate level of DR obligation that should be imposed on non-utility LSEs, and (iii) the appropriate compliance flexibility non-utility LSEs must be afforded.

IV. CAISO MARKET INTEGRATION

Q. CLECA's witness Barkovich raised a concern that the CAISO's requirement that DR Providers reach agreement with the LSE before registering a DR resource may limit development of such Supply DR, particularly when direct access customers are involved.[43] Do you have a response to this concern?

A. Yes. I believe Dr. Barkovich's concerns are unfounded. First of all, I was directly involved in developing these rules jointly with other parties for direct participation of retail customer load in CAISO markets, which was undertaken in conjunction with Rulemaking 07-01-041. This requirement was developed by and agreed to by all those participating in the effort at the time. The intent was not to limit participation, but to be sure that the LSE serving the customer, be it an IOU or an ESP, is aware that its customer is enrolling as part of a Proxy Demand Resource ("PDR") at the CAISO and can make

[43] CLECA, p. 10.

arrangements with the customer, if needed, to ensure that the customer's participation in the program is consistent with their tariffed service or retail choice service, as the case may be. The CAISO does not dictate the type or form of the agreement, or even whether it is oral or written.[44] I know of no instance in which an ESP refused to allow one of its customers to participate in a PDR. Also, the CAISO requires that each PDR include customers of only one LSE. Thus, if an IOU elects to form a PDR using direct access customers, it would be required to construct PDRs consisting of customers all served by the same ESP. So, only one agreement with one ESP would be needed, which could presumably make the process of reaching an agreement simpler.

Q. Does this conclude your testimony?

A. Yes, it does.

[44] See CAISO's PDR Frequently Asked Questions for PDR, Qualifications, Question 4, p. 2, stating that the CAISO "does not define the specific agreements needed between the DRP and the Load Serving Entity;" available on CAISO's web site at: http://www.caiso.com/participate/Pages/Load/Default.aspx