

Multi-year Forward Resource Adequacy Requirements

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May 2, 2014 workshop in R.14-02-001



Multi-Year Forward (MYF)

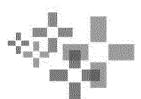
- It's <u>not</u> about building new resources
- It's about contracting with existing resources to ensure forward needs can be met cost-effectively
- It's about economic deferral of retirement

We have "soft" MYF now

- No forward requirements
- LSEs may contract for RA capacity multiple years forward

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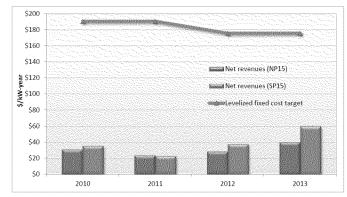




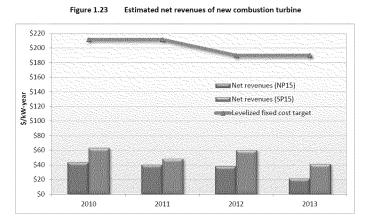
An "open" window in time

- Last SCE MYF RA RFO in 2011
 - Units rolling off those contracts very soon
- NRG facing many open positions
 - Including some resources identified as needed in 2018
 - 2013 CAISO annual report confirms: resources need contracts to remain economically viable





Source: CAISO 2013 Annual Report on Market Issues and Performance





Sutter a case study

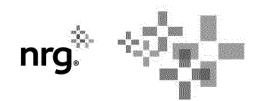
- Plant rolled off CDWR contract
- Faced major maintenance
- CAISO sought to increase RoR authority term
- CPUC stepped in to order contracting

What do you do now to address a far-forward need?

Orderly retirement

- CAISO backstop authority limited to one-year forward
- Universal opposition to extending CPM MYF (FLRR)
- Is the "crisis management" approach best?

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What value do MYF RA requirements provide?

- Revenue certainty:
 - Allows for consideration of cost-effective major maintenance or capital additions that could keep existing generation in operation
 - Amortizes capital additions and major maintenance over longer period
 - Reduces risk of outages or increased costs due to deferred maintenance
 - Leads to more orderly retirement
 - Reduces CAISO backstop procurement

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To be most effective:

- MYF RA requirements cannot be too highly "feathered" (i.e., a decreasing forward obligation)
 - But the more forward the needs assessment, the less dependable it is
- There should be opportunities to restructure forward positions prior to delivery year
 - In a purely bilateral market how?

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