

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Annual Local Procurement Obligations.

Rulemaking 11-10-023
(Filed October 20, 2011)

**REPLY COMMENTS OF THE UTILITY REFORM NETWORK
ON THE PROPOSED DECISION ADOPTING LOCAL PROCUREMENT AND
FLEXIBLE CAPACITY OBLIGATIONS FOR 2015,
AND FURTHER REFINING THE RESOURCE ADEQUACY PROGRAM**



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June 23, 2014

I. INTRODUCTION

Pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedures, The Utility Reform Network (TURN) submits these reply comments regarding the Proposed Decision (PD) titled *Decision Adopting Local Procurement and Flexible Capacity Obligations for 2015, and Further Refining the Resource Adequacy Program*, which was issued May 27, 2014.

II. THE COMMISSION SHOULD STATE ITS EXPECTATION THAT THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR WILL PROPOSE A TARIFF THAT ACCEPTS THE COMMISSION'S FLEXIBLE RESOURCE ADEQUACY COUNTING RULES BY REFERENCE

Like TURN¹ and other parties, PG&E expressed concern about the conflicts between the flexible Resource Adequacy (RA) counting rules the Commission would adopt pursuant to the PD and those the California Independent System Operator (CAISO) has proposed in its draft tariff.² PG&E offered a simple proposal to address these issues: that the CAISO adopt the Commission's policies on such issues by reference in its tariffs, as it now does with other RA counting issues. TURN endorses PG&E's recommendation that the Commission state its expectation that the CAISO will propose such tariff language to the Federal Energy Regulatory Commission.

III. CONCLUSION

TURN appreciates the opportunity to provide additional comments on the PD and requests that the Commission make the change described in Section II above.

¹ TURN's June 16 Comments, p. 2.

² PG&E's June 16 Comments, pp. 2-4.

Dated: June 23, 2014

Respectfully submitted,

By: _____/s/_____
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