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Bcc:

Subject: Integration Adder - Questions to Guide Reply Comments

All,

Thank you to those that provided comments on July 2, 2014 related to questions in the 2014 RPS Procurement Plans Ruling on the development of a renewable integration adder. To help guide reply comments, Energy Division is providing (see below) a number of follow-up questions based largely on parties' initial comments. As a reminder, reply comments are due July 30, 2014. Feel free to contact me or Paul Douglas with any clarifying questions.

Regards,

Jason L. Simon, CFA

Renewable Energy Market Development

California Public Utilities Commission

(415) 703-5906

Questions to Guide Reply Comments

1. There is general consensus among parties that an integration adder should be dynamic, updated frequently and differ based on technology and location. Furthermore, most parties agree that an adder should only include the indirect costs associated with integrating variable energy resources such as costs associated with regulation, ramping and cycling. If this is the case, should the term “integration adder” be changed to reflect these agreed upon attributes if what ends up being calculated are unique costs for each technology based on changes in electrical systems’ portfolio mixes over time? What is your recommendation and what standard “term” and “definition” do you believe the CPUC should adopt?
2. If integration adders were developed in the LTPP Proceeding, would updating the adders best be achieved by including that as part of the biennial LTPP process? If not, what frequency and manner would be ideal? How would those results be introduced into the LTPP record?
3. Three general approaches to calculating integration adders were identified by parties – 1) using values from publicly available studies, 2) using market-based cost data from CAISO’s regulation and upcoming flexible capacity markets, and 3) using the operational flexibility studies currently scoped in the LTPP proceeding to inform the development of integration adders. Please comment on the advantages and disadvantages of each approach and recommend a procedural framework for implementing your preferred approach. If your recommended framework utilizes more than one approach please be specific regarding the procedural steps and timeline that the CPUC should follow in developing integration adders.
4. Do you think it is important for the Commission to determine a methodology for the development of integration adders as well as calculate the values to be used in LCBF? Or is it more appropriate that the IOUs be responsible for calculating integration cost adders based on the methodology developed by the CPUC? Please recommend your preferred approach by weighing the strengths and weaknesses of allowing for IOU-based values. In considering your recommendation, how important is it that the values calculated be verifiable by parties?
5. Do you think it is important for the CPUC to adopt a methodology to calculate integration adders in time for the 2014 RPS Solicitation beginning in early 2015? If so, can any of the three general approaches mentioned in Question 3 meet this objective while also providing reasonable and defensible cost estimates? In addition, do you believe integration adders, if calculated using one of the three approaches, will be significant enough to alter procurement decisions?
6. In its comments, PG&E provided a framework for calculating integration adders using production cost modeling. If parties agree that production cost modeling should be utilized to determine the costs associated with integrating renewables, do you agree with the framework that PG&E has proposed? Are there any modifications to the framework

that you would make? If so, provide a modified framework in your response.

7. Integration costs may rise as the saturation level of renewable resources increases over time. If production cost modeling is used to assist in developing integration adders, what level of renewable saturation should be assumed and what is your rationale?
8. In its comments, CalWEA provided a framework for calculating the short-term, medium-term and long-term costs associated with renewable integration. Please comment on the practicality of this framework and whether you think it could meet the objective of developing integration adders that are reasonable and defensible. What refinements need to be made to the proposed framework for it to achieve the stated objectives?