# **APPENDIX F**

# Resource Adequacy Month-Ahead Filing Guide and Cover Letter

#### **PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



March 29, 2006

All Load Serving Entities (LSEs)

Re: Guidance to all Load-Serving Entities (LSEs) Regarding the Upcoming Monthly Resource Adequacy Requirement Compliance Filings, required by D.05-10-042 in R.04-04-003.

Energy Division, and CEC collaborative staff, in consultation with interested parties have assembled the following enclosed materials to assist LSE in making the required monthly Resource Adequacy filings:

- Monthly Resource Adequacy (RA) Guide (and this cover letter) in MS-Word # 228907;
- Monthly Reporting Template Spreadsheet and Instructions in MS-Excel #228908;

In addition, the Energy Division requests your attention to some common mistakes that appeared in the year-ahead filings.

- Failure to include the correct dates in the capacity start and end date. Specifically some LSE's reported an end date of the 30<sup>th</sup> in months with 31 days. Please be precise with dates, and ensure that they are correct for all contracts.
- Failure to accurately report the Resource ID so the reported resource did not match an ID in the CAISO Master File.
- Including extraneous material in the advice letter, such as a copy of the RA Guide.

For questions about the enclosed materials or about the upcoming May 1, 2006 June RAR compliance filing, please contact Robert Strauss at <u>RLS@cpuc.ca.gov</u> or (415) 703-5289, or Donald Brooks at dbr@cpuc.ca.gov or (415) 703-2626.

Sincerely,

Sean Gallagher, Director CPUC Energy Division

Enclosures (2 electronic files including this cover letter) cc: Commissioners
Steve Larson, CPUC Executive Director;
Grant Rosenblum, Phil Pettingill, Keith Johnson, CAISO;
Mike Jaske, Lynn Marshall, CEC;
Via email to the R.05-12-013 Service List;

# Resource Adequacy (RA) Guide for Monthly Filings

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1.	Load Forecast Adjustments		

# 1. Load Forecast Adjustments

D.05-10-042 stated "[w]e require that month-ahead compliance filings include adjustments for positive and negative load growth due to migration. Apart from load changes due to load migration, load forecasts should not be updated from LSE's year-ahead filing."

On November 22, 2005, the CEC sent each LSE its monthly RA obligation for June-December 2006. Subsequent to that, some LSEs submitted updated forecasts with supporting information, which the CEC incorporated into a revised monthly forecast for use in the year-ahead filing. Because the year-ahead forecasts made assumptions about direct access load, the year-ahead forecasts need to be revised to account for actual direct access customer migration to date, and expected additional load migration prior to the obligation period. No other adjustments may be made to the load forecasts approved for the year-ahead filing.

Each LSE is responsible for adjusting its load forecast for migration of existing direct access load. An LSE with migrating direct access customers must adjust its monthly load forecast and monthly RA obligation and reflect those changes on the monthly RA Template. IOUs should adjust their forecast to account both for customers who are known to have returned to bundled service and for those that have notified the IOU that they intend to return to bundled service prior to the Filing Month. ESPs should account for contracted load and a reasonable expectation for the rate of contract renewals of non-firm load or load with expiring contracts.

To facilitate the forecast revision process and verify that migrating load is correctly accounted for, a separate template is provided. All LSEs, whether they are adjusting their forecast or not, are required to submit supporting data, including recent monthly peak loads and customer counts by class for recent months. LSEs which have gained or lost customers since their year-ahead forecast will enter the amount of monthly peak load associated with the change in customers, and the template will make the appropriate adjustments, including coincidence. All LSEs must submit this template 30 days prior to the Monthly Filing deadline. CEC staff will review the submitted forecasts and notify the LSE if the adjusted forecast is accepted or requires additional support within 10 business days. For example, all LSEs must file load forecasts templates for June 2006 by March 31, 2006 (the first business day 30 days before the May 1 compliance filing date), the CEC will notify LSEs by April 14, 2006. See the table below for the filing dates for 2006.

RA filing month (due date)	Date load forecasts due	<b>Date of CEC response</b>
June 2006 (5/1/06)	March 31, 2006	April 14, 2006
July 2006 (5/31/06)	May 1, 2006	May 15, 2006
August 2006 (6/30/06)	May 31, 2006	June 14, 2006
September 2006 (7/31/06)	June 30, 2006	July 15, 2006
October 2006 (8/31/06)	August 1, 2006	August 15, 2006
November 2006 (10/2/06)	September 1, 2006	September 18, 2006
December 2006 (10/31/06)	September 29, 2006	October 16, 2006

# 2. Resource Eligibility for One of Four Categories Or Buckets

The monthly RA compliance filing will use the eligibility criteria developed for the 2006 year-ahead filing and which was developed through the December 9, 2005 workshop.

Summary of Resource "Buckets"				
	Consensus Agreement			
Category	Resources may be categorized into one of the four categories shown below, according to their planned availability as expressed in hours available to run or operate per month (hours/month):			
1	"Greater than or equal to" the ULR [Use Limited Resource] monthly hours as shown in the Phase 1 Workshop Report, Table "Number Hours ISO Load Greater than 90% of the Monthly Peak," p.24-25, last line of table, titled "RA Obligation," <a href="http://www.cpuc.ca.gov/word_pdf/REPORT/37456.pdf">http://www.cpuc.ca.gov/word_pdf/REPORT/37456.pdf</a>			
	These ULR hours for May through September are, respectively: 30, 40, 40, 60, and 40, which total 210 hour and have been referred to as "the 210 hours."			
2	2 "Greater than or equal to" 160 hours per month.			
3	"Greater than or equal to" 384 hours per month.			
4	All Hours (planned availability is unrestricted)			

# 3. Demand Response (DR) Resources Shall Be 'Taken Off The Top'

Dispatchable Demand Response (DR) resources shall be 'taken off the top' and assigned to a separate, un-numbered DR resource category or bucket that will not have a maximum cumulative contribution (MCC) percentage. The amount of capacity (MW) in the DR bucket will be credited toward an LSE's RA obligation. For example, if LSE-ABC has a 1,000 MW RA obligation in June 2006, and LSE-ABC shows 100 MW of DR resources in the DR bucket, LSE-ABC's remaining obligation is 900 MW, which must be met with an acceptable combination of Category 1, 2, 3, and 4 resources in compliance with MCC percentages.

CEC Allocations of DR resources should be recorded in the RA template on the DR-a\_2hr-Plus sheet. LSEs should not record the individual DR program details from CEC allocated DR programs. Only the total summary information for the allocation is required. LSEs are required to provide all program details for DR programs operated by the LSE.

Non-dispatchable demand response resources are considered a reduction in demand and were included in the forecast load calculations distributed by the CEC. Therefore, they are not included in this showing other than through the calculation of the RA obligation.

# 4. Outages

#### Scheduled Outages:

For resource adequacy (RA) counting purposes, LSEs should use the scheduled outage criteria in the table below. The CAISO must approve all outage schedules for a RA resource. Any change to the RA resource's outage schedule must be approved by the CAISO. If the CAISO approves a change to the outage schedule, the outage schedule change will not change the RA counting of the resource. If the CAISO denies an outage request, the RA resource is expected to remain available.

Counting Resources with Scheduled Outages				
Time Period	e Period Description of How Resource Would Count At Time of Showing			
Summer May through September	Any month where days of scheduled outages exceed 25% of days in the month, the resource does not count for RA. If scheduled outages are less than or equal to 25% the resource does count for RA.			
	For scheduled outages less than 1 week, the resource counts for RA.			
Non-Summer				
Months	For scheduled outages 1 week to 2 weeks, the amount counted for RA is prorated using the formula:			
October	[ 1 - (days of scheduled outage/days in month) - 0.25] * MW = RA			
through April	The formula will allow resources to count between 50% and 25%.			
	For scheduled outages over 2 weeks, the resource does not count for RA.			

#### Forced and Maintenance Outages:

A forced or maintenance outage of a RA resource occurring during an operational month does not change the RA compliance established for that LSE for that month. If the forced or maintenance outage continues into a succeeding month, or months, the resource may still be counted towards the LSE's RA compliance.

# 5. Allocation of Reliability Must Run (RMR) Units

**Allocation of RMR Condition 1 Units.** RMR Condition 1 units are not to be allocated for RA purposes. If an LSE enters into a separate RA contract with an RMR condition 1 unit, it is counted as any other physical resource.

**Allocation of RMR Condition 2 Units.** RMR Condition 2 units should be allocated as follows:

For each LSE, the CEC/PUC calculated the LSE share of each IOU transmission service area annual peak (based on the CEC's forecasts). These share percentages totaled 100% in each IOU service area after some adjustments to account for issues such as coincidence. The CEC/PUC applied the annual share percentages in each IOU transmission service area against total RMR

Condition 2 MWs in that respective IOU transmission service area to allocate RMR Condition 2 MWs.

On December 28, 2005, the PUC distributed to each LSE the total of its RMR Condition 2 allocation for use in the 2006 demonstrations. All information in this process will remain confidential because the underlying RMR capacity contracts are confidential.

RMR Condition 2 capacity allocated to LSEs must be adjusted to reflect conversion to RMR Condition 1 status. Any reductions in RMR Condition 2 available resources that occur 80 days or more before an affected month shall cause a recalculation of the LSE's RMR Condition 2 allocation. LSEs shall be informed 75 days before the affected month. LSEs must adjust their RA resources to ensure their monthly showing meets the 100% RA obligation using the revised RMR Condition 2 allocation. Changes that occur less than 80 days before the affected month will not cause a change in RMR Condition 2 counting for RA.

# 6. Intertie Capacity Allocation Process

On February 1, 2006, the CAISO distributed to all LSEs their 2006 Intertie Allocations. On February 16<sup>th</sup>, 2006 the Commission issued D. 06-02-007 to revise D.05-10-042, and allow for the re-trading or reselling of Intertie Allocations. If an LSE trades or sells Intertie Allocations after the year-ahead filing, the transaction must be reported to the CPUC and ISO providing details of the LSE decreasing its Intertie Allocation, the LSE increasing its allocation, the amount of the original allocations of all involved LSEs (by path), and the changes to the allocations.

# 7. Resource Adequacy (RA) Portfolio Resources

The Monthly RA compliance filings do not allow the use of portfolio resources<sup>1</sup>. If an LSE used portfolio resources in its year-ahead RA compliance filing it must convert the portfolio resources to specific units for the Monthly RA compliance filing.

# 8. Liquidated Damages (LD) Contracts

In order to be counted for the RA Monthly Filing, liquidated damage (LD) contracts must comply with the following rules:

- 1. No LD contract entered into after 10/27/05 can be used for RA purposes.
- 2. LD contracts entered into on or before 10/27/05 can not be modified to increase the number of MW or the duration of the contract for RA purposes.

For all monthly filings in calendar year 2006, LD contracts cannot count for more than 75% of the LSE's RAR portfolio. LD contract MW in excess of 75% of an LSE's RAR portfolio do not count for RA compliance. For example, if LSE-1's total RAR is 1,000 MW, then LSE-1 cannot count more than 750 MW of LD contracts towards its RA filing requirement. The LSE must

<sup>&</sup>lt;sup>1</sup> Portfolios are plant-specific RA contracts, not unit-specific RA contracts. For example, in a <u>year-ahead</u> compliance filing, LSE-ABC may want to enter into an RA contract with a generator for 200 MW to be provided by <u>any one of</u> three units at the Acme Power Plant, as opposed to a specific unit.

show that at least 25% of their RAR is met through non-LD contract resources. Firm import LD contracts with specific Intertie Points and Intertie Allocations are not subject to these phase-out provisions.

## 9. DWR Contracts

All DWR CERS contracts shall be entered on a separate worksheet page in the RA Monthly Filing Template. This page allows the LSE to enter DWR contracts that may or may not fit in the other pages of the template.

# 10. Certification of LSE Resource Adequacy Compliance Filing

All LSE Resource Adequacy (RA) compliance showings shall be filed under the following certification.

Consistent with Rules 1 and 2.4 of the CPUC's Rules of Practice and Procedure, this Resource Adequacy compliance filing has been verified by an officer of the corporation who shall expressly certify, under penalty of perjury, the following:

- 1. I have responsibility for the activities reflected in this filing;
- 2. I have reviewed this compliance filing;
- 3. Based on my knowledge, this filing does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made;
- 4. Based on my knowledge, this [filing] contains all of the information required to be provided by CPUC orders, rules, and regulations.

The actual certification page that must be completed and signed is included as a separate tab in each of the template workbooks.

# 11. RA Filings Instructions

The Monthly RA Filings cover the entire Filing Month, and are due at the Commission's Office in San Francisco, and at the CEC and ISO offices, on the last day of the month two months before the Filing Month. If that day is not a business day, the filing is due on the next business day. For example, the first monthly filing to cover the month of June is due on April 30<sup>th</sup>, but April 30<sup>th</sup> is a Sunday; in this case the filing is due May 1. The chart below lists the due dates for the first seven Month-Ahead Filings and the due date for the next Year-Ahead Filing. Pursuant to D. 05-10-042, filings are to be made via Advice Letter. Instructions for filing Advice Letters for RA compliance follow in Appendix A, and an Advice Letter Summary Sheet to be included in the RA Filing follows in Appendix B

Type of Filing	<b>Due Date</b>
June Month-Ahead	May 1
July Month Ahead	May 31
August Month-Ahead	June 30
September Month-Ahead	July 31
October Month-Ahead	August 31
November Month-Ahead	October 2
December Month-Ahead	October 31
2007 Year-Ahead	October 2

File with the agencies at the addresses below:

- 1. An Advice Letter that complies with the rules in Appendix A and includes a cover sheet;
- 2. A completed RA Reporting Monthly Template.

CPUC Energy Division	California Energy Commission	CAISO
505 Van Ness Avenue 4 <sup>th</sup> Floor	1516 Ninth Street	151 Blue Ravine Road
San Francisco, CA 94102	Sacramento, CA 95814	Folsom, CA 95630
Attn: Tariff Room (RAR Filing) Please include 3 paper and 1 electronic copy	Attn: Mike Jaske (RAR Filing) Please include 1 paper and 1 electronic copy	Attn: RAR Filing Please include 2 paper and 2 electronic copies

The filing must include hardcopies and a CD containing electronic filings of each template workbook. Each template workbook must include a certification signed by an officer of the corporation. Filings must be received on the due date; postmarks are not acceptable for monthly filings. The RA filing (Advice Letter with Summary Sheet and RA Monthly Template) shall be submitted to the CPUC Energy Division, CEC, and CAISO at the addresses listed above. The LSE shall file three paper copies and one electronic copy (by CDROM in word and excel format) with the CPUC Energy Division. The CPUC will return one of the paper copies to the LSE stamped and dated as received. The LSE is also to submit one electronic copy and one paper copy to the CEC, and two paper and two electronic copies to the CAISO. The CEC and CAISO will not stamp and return copies. The Energy Division will report Advice Letters and related documents and the date of their receipt, in the Daily Calendar.

We have included one page for each worksheet. If more are needed, add rows into the Excel spreadsheet and enter your additional contracts. It is the responsibility of the LSE to ensure that all formulas used in the spreadsheet are not changed, and that all information is integrated into the formulas correctly. Please do not print out and mail this RA Guide or the Template Instructions. You can remove these from your filing, as they are unneeded for compliance review.

# 12. Correction of Errors in the Filings - Either Minor or Substantial

There are specific Advice Letter rules and procedures LSEs must follow when making corrections or addition to their RA filings. These are detailed in Appendix A, Primer for the Filing of Advice Letters. There are three classes of corrections: those that require replacement sheets to correct typos and numerical errors, minor errors that require Supplemental Advice Letter filings which clearly explain the corrections, and more substantial errors which require the filing of an entirely new Advice Letter. The PUC has discretion over classifying errors, and ordering corrections.

#### APPENDIX A

## Advice Letter Rules for Resource Adequacy Compliance Filings

1. Applicability

D.05-10-042 ordered all LSEs to make the year-ahead RA compliance filings and the monthly RA compliance filings by Advice Letter. The primary use of an Advice Letter is to transmit tariff sheet changes, but an Advice Letter may be used for other purposes.

#### 1.1 Code of Ethics

Rule 1 ("Code of Ethics") of the Commission's Rules of Practice and Procedure (California Code of Regulations, Title 20, Division 1, Chapter 1) shall apply to all matters governed by these rules.

#### 1.2 Computation of Time

As used in these rules, "day" means a calendar day, and "business day" means a calendar day except for Saturdays, Sundays, and weekdays when the Commission's offices are closed, due either to a State holiday or to an unscheduled closure (e.g., an emergency or natural disaster). The Commission's Internet site (www.cpuc.ca.gov, under "About CPUC") will maintain a list of State holidays for the current calendar year and a list for the following calendar year as soon as that list is available.

When these rules set a time limit for performance of an act, the time is computed by excluding the first day (i.e., the day of the act or event from which the designated time begins to run) and including the last day. If the last day does not fall on a business day, the time limit is extended to include the first business day thereafter.

#### 2. Cover Sheet

The RA Filings (Advice Letter with Summary Sheet and Monthly RA Template) shall include a cover sheet, which shall state the date when the LSE served the Advice Letter and filed it with the Energy Division. The cover letter shall summarize the contents of the Advice Letter, as follows:

- (1) Indicate requested effective date;
- (2) Indicate service affected by the Advice Letter (in this case Retail Electric Service);
- (3) Cite Commission orders by decision or resolution number (in this case D.05-10-042) and Public Utilities Code or other statutory provisions (by section) related to the substance of the Advice Letter, and identify as compliance filing (where applicable);
- (4) Indicate whether the LSE believes disposition of the Advice Letter by Commission resolution is necessary or appropriate (RA compliance filings do not require a resolution);
- (5) Show contact person, telephone number, and e-mail address for additional information regarding the Advice Letter
- (6) Protest Period; state that RA compliance filing not subject to protest.

A sample cover sheet is attached as Appendix B. If an Advice Letter does not include a complete cover sheet, as described above, the Energy Division may reject the Advice Letter without prejudice or extend the protest period unless and until the LSE files the information that is missing or incomplete with the CPUC.

#### 3. Form and Content

#### An LSE shall:

- (1) number the Advice Letter sequentially, beginning with No. 1 for the first Advice Letter filed by the LSE, followed by the letters ESP if the LSE is an ESP or E if the LSE is an IOU.
- (2) state whether any deviations would be created, service withdrawn from any present customer, or more or less restrictive conditions imposed;
- (3) state the notice requirements applicable to the Advice Letter, and describe how those requirements were satisfied.

# 4. Filing Advice Letters and Related Documents

The RA filing (Advice Letter with cover sheet, RA Template, and LD Template) shall be submitted to the CPUC Energy Division, CEC, and CAISO at the addresses listed above. The LSE shall file three paper copies and one electronic copy (by CDROM in word and excel format) with the CPUC Energy Division. The CPUC will return one of the paper copies to the LSE stamped and dated as received. The LSE is also to submit one electronic copy and one paper copy to the CEC, and a set of two paper and two electronic copies to the CAISO. The CEC and CAISO will not stamp and return copies. The Energy Division will report Advice Letters and related documents, and the date of their receipt, in the Daily Calendar.

#### 5. Confidentiality

Pursuant to the Revised Protective Order issued February 10<sup>th</sup> and D. 05-10-042, the entire RA filing (the cover letter, RA template, and LD template) is protected and confidential. Each page of each document should be marked, "Protected Materials," "Protective Order," or "Section 583" and sequentially numbered (e.g. Bates stamped). For digital materials, each disk or other storage device should also be so marked.

#### 6. Service to Other Parties

The RA Monthly 2006 filings are compliance filings, confidential, and not subject to protest. Therefore, service beyond the above filing requirements (CPUC, CEC, and CAISO) is not required.

### 7. Correction of Errors made in RA Filings

Corrections to the RA Filing are to be made according to the rules for correcting errors in Advice Letters as established in GO 96-A. Minor typographical or numerical inaccuracies can be made by submitting new pages for old incorrect pages. Other minor errors can be corrected by submitting a Supplemental Advice Letter that details minor changes. Major errors may require the filing of an entire replacement letter. The PUC Staff reserves the discretion to classify errors as one of the three classes, and to order corrections. Directions for all three cases follow.

## • Typographical and Numerical Errors:

Simple typographical or numerical errors can be corrected by the LSE or upon request by the PUC by submitting revised pages to replace the pages with the errors. Service of revised pages must be made on paper, with the intention and ability to easily swap the new pages into place without inconsistencies. Service of revisions electronically must include the entire file with the corrections integrated. Corrections of this type do not require an Advice Letter Cover Sheet or Summary Page. Examples of typographical or numerical errors include typing one digit incorrectly in a contract ID, filing a number 1243 for 1234, etc.

Correction and submittal of corrected pages must be completed within five business days after notification by telephone or email.

#### • Other Minor Errors

Other minor errors must be corrected via the filing of a Supplemental Advice Letter, with the corrections clearly explained in the Advice Letter Cover Sheet and noted on the Summary Sheet in front. The numbering of the Advice Letter is to be the same as the original Filing, with the addition of the letter 'A' to the end of the number (e.g. ELC0001-1ESP-A). Subsequent corrections to the same original Advice Letter should use subsequent letters. For example, the second correction of the original letter detailed above would hold the number ELC0001-1ESP-B. Supplemental Advice Letters are evaluated similarly to regular Advice Letters, and are subject to the same filing provisions. Examples of minor errors include omitting a resources availability, filing a resource under an incorrect tab (recording an LD contract as an import), and any typographical or numerical error that would change an LSE's compliance status.

Correction and submittal of corrected pages must be completed within five business days after notification by telephone or email.

#### • Substantial Revisions – Entirely New Advice Letter

For more substantial errors, the LSE may be asked to refile a second complete RA Filing Package and advice letter. The numbering of the Advice Letter will use the next available number, and list the original Advice Letter that is being replaced on the appropriate spaces on the Summary Sheet. The Advice Letter Cover Sheet should also clearly explain the reasons behind the second filing of the entire RA Filing.

# APPENDIX B

# CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)				
Company name/CPUC Utility No.				
Utility type:	Contact Person:			
□ ELC □ GAS	Phone #:			
□ PLC □ HEAT □ WATER	E-mail:			
EXPLANATION OF UTILITY	TYPE	(Date Filed/ Received Stamp by CPUC)		
ELC = Electric GAS = Gas PLC = Pipeline HEAT = Heat	ELC = Electric GAS = Gas			
Advice Letter (AL) #:				
Subject of AL: _				
Keywords (choose from CPUC listin	g):			
AL filing type: □ Monthly □ Quarte	rly 🛘 Annual 🗘 On	ne-Time		
If AL filed in compliance with a Cor	nmission order, ind	icate relevant Decision/Resolution:		
Does AL replace a withdrawn or rej	ected AL? If so, ide	ntify the prior AL		
Summarize differences between the	e AL and the prior w	rithdrawn or rejected AL1:		
Resolution Required? ☐ Yes ☐ No				
Requested effective date:	Requested effective date: No. of tariff sheets:			
Estimated system annual revenue	effect: (%):			
Estimated system average rate effective	ct (%):			
When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).				
Tariff schedules affected:				
Service affected and changes propo	sed <sup>2</sup> :			
Pending advice letters that revise the same tariff sheets:				
Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:				
CPUC, Energy Division Utility Info (including e-mail)				
Attention: Tariff Unit				
505 Van Ness Ave., San Francisco, CA 94102				
jjr@cpuc.ca.gov and jnj@cpuc.ca.gov				
<u> </u>				

<sup>&</sup>lt;sup>2</sup> Discuss in AL if more space is needed.

## Frequently asked questions and clarifications to the filing instructions:

1. Question: What if I have more than one contract with the same facility? Maybe there is a baseload contract with a generator for part of the capacity, but also peak capacity contract for the rest? How should I file that in the RA template; should I include all that information in one line with one contract ID?

Answer: Please list each separate contract on separate lines, consecutively in the RA template. The CAISO unit ID (column C) will remain the same, but the RA Capacity contract number (column G) will be different. Please list all information for each contract because functionally they are different contracts.

2. Question: What if I have one contract for peak capacity for say 15 MW and a second contract for off-peak capacity for 5 MW? How should I file that in the RA template; should I include all that information in one line with one contract ID?

Answer: If the peak and off peak contracts combine to cover a 24 x 7 period, split the peak contract into two components 5 MW to match with the off-peak contract and 10 MW that remain peak. Then, on one line report the 5 MW peak and 5 MW off peak contracts as a single resource in category 4 (all hours). On a second line report a 10 MW peak contract. On the line with 2 contracts, both contract numbers should appear in the contract ID cells.

**3. Question:** What if I have one contract with a facility, or LD contract, that includes different components, for example 100 MW 7x24, and 15 MW 7x16? How should I file that in the RA template; should I include all that information in one line with one contract ID?

Answer: If a single resource contract has separate components that qualify in different resource categories, the contract should be entered in the RA Template in multiple lines. Using the example, one line should be completed using the 100 MW 7x24 component and a separate line should be completed using the 15 MW 7x16 component. Each line should include all information.

**4. Question:** What does it mean in the instructions for Column H in worksheets I through VI of the RA template titled **Minimum Hours in Month**, where the directions refer to "during peak load hours?"

"Minimum Hours in Month - The minimum number of hours in the RA month that the RA resource is contractually or physically available and capable of operating at its Qualifying Capacity during peak load hours to meet the LSE's RA obligation."

Answer: The minimum hours in a month are the minimum hours that a resource is available. For example a 5x4 contract is available for 80 hours a month. To count, those hours must be peak hours. A 5x4 contract that is available between 2 and 6 am would not deliver RA benefits. Different programs have different definitions of peak hours, so for this template peak hours are counted in accordance with program rules. For example, solar and wind resources define peak as noon to 6pm per D 05-10-042.

**5. Question:** Do firm import LD contracts signed after 10-27-2005 still count towards RA requirements, or are they subject to the same sunset date and phase out percentages as in-area LD contracts are pursuant to page 65 of ALJ Wetzell's D. 05-10-042?

Answer: Firm import LD contracts do not fall under the sunset and phase out provisions because they do not present the same deliverability and reliability issues as in-area LD contracts. Thus Firm import LD contracts with specific intertie agreements do not fall under the same phase out schedule.

**6. Question:** What is the difference between CAISO resource ID number in Column C and the Resource Capacity contract ID in column G in Worksheets I, II, and IV in the RA Template?

Resource ID in CAISO Master File - The CAISO-assigned Resource ID.

**Resource Capacity Contract Number** – LSE specified number that identifies the relevant contract(s). This information will be used to identify supporting documentation during compliance verification.

Answer: Column C, Resource ID in CAISO Master File is a standard ID name supplied for a particular unit from the CAISO Master File. Column G, Resource Capacity Contract Number, refers to the LSE's contract ID number. If there are two contracts with the same unit, then contract numbers (column G) would be different, but the CAISO Resource ID or CPUC LD contract number (Column C) would be the same. Please refer to Question 1 above.

7. Question: The RA guide tells an LSE to input into the DR worksheets those programs that are over 2 hrs per day and those that are under 2 hrs per day, in separate worksheets. The guide also says that the numbers are to be found in the letter from the CEC regarding allocations for DR programs. This letter does not make clear which programs are under 2 hrs a day and which are over 2 hrs a day, the letter only gives capacity. Where do I put these numbers?

Answer: All the programs listed in the CEC letter are for over 2 hrs a day; that was how the CEC analyzed it. Put all programs listed on the CEC letter for over 2 hrs a day.

**8. Question:** What is the desired level of accuracy for numbers, 1 MW, 0.5 MW, 0.1 MW? Do I round numbers off to the nearest 1MW, 0.5MW or 0.1 MW?

Answer: Round off to nearest 0.1 MW like the load forecasts and RMR allocations do. Do not round any more than that. Precision is important, particularly for smaller LSEs

9. Question: If I have no LD contracts, do I need to file the LD worksheet in the RA Template?

Answer: No. Just state it in the Advice Letter that the LD worksheet is unneeded. In fact, any part that does not apply to you can be left out, with statement in the Advice Letter what is missing and why. Please also limit submissions of blank pages. Just use the sheets that you need.