

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

Order Instituting Rulemaking to Promote Policy)
and Program Coordination and Integration in)
Electric Utility Resource Planning)
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R.04-04-003
(Filed April 1, 2004)

**COMMENTS OF CALPINE CORPORATION
ON CAPACITY MARKETS WHITE PAPER**

Pursuant to the August 25, 2005 Chief Administrative Law Judge’s Ruling, Calpine Corporation (“Calpine”) files these comments on the California Public Utilities Commission (“Commission”) Capacity Markets White Paper (“White Paper”). Calpine appreciates the opportunity to comment on the White Paper and believes the Commission’s Energy Division should be complemented for an excellent job on this important and complex issue. The White Paper is a well-written, thoughtful, and well-reasoned document that considers a number of important issues that must be addressed by the Commission.

Calpine agrees that the development of a centralized capacity market along the lines outlined in the White Paper should be pursued. The development of such a capacity market, however, should be a lower priority as compared to other more pressing needs – *specifically, the urgent need for new capacity*. The development, approval and implementation of a centralized capacity market will take significant effort and time. In the interim, Calpine is concerned that such a process may distract stakeholders and policy makers from the most important and immediate tasks of the time: assuring that the *new* capacity needed by California is being built and that existing capacity remains in operation over the near term to avoid the risk of another energy crisis. The capacity markets contemplated in the White Paper simply cannot be developed, approved and implemented on a timeframe that will stimulate the investment needed

in new generation in time to meet expected demand or to ensure that existing plants are provided the proper price signals.

While Calpine is not a member of the Coalition for California Energy Policy Reform which has developed the “California Energy Policy Reform Recommendations,” Calpine does agree with the overall framework and timing laid out in the document: First, during a transition period, make sure rules are in place to bring additional generation online in California. Second, develop market mechanisms to allow the wholesale market to be fully functional (this phase could include the development of a centralized capacity market along the lines contemplated in the White Paper). Third, reinstitute the competitive retail market.

I. KEY STEPS THAT MUST BE TAKEN BY THE COMMISSION

Listed below are the activities regarding the electric market that must be focused on by regulators and stakeholders to ensure resource adequacy over the next several years. These activities are listed in priority order, with the first three items having the dominant need for near term attention.

- 1. Finalize the rules for the current Load Serving Entity (“LSE”) based Resource Adequacy Requirement (“RAR”) showings in a manner that ensures sufficient existing capacity will be online and delivering energy to California’s grid when and where it is needed.**

Reliability must be assured through proper implementation of the initial LSE-based RAR model. This process is necessary so that imminent resource needs can be met in a controlled manner that will provide an adequate opportunity to get the design and implementation of a centralized capacity market right.

- 2. Adopt a “standardized” capacity product to clearly define what terms and conditions of supply will satisfy the LSE’s Resource Adequacy (“RA”) showing before the Commission.**

The Commission must define exactly what counts as capacity and what function that capacity is required to perform. The product needs to be a specific, physical, and deliverable

capacity. This is essential for establishing a valid, real RAR. Moreover, the product should also define the obligation that the RA capacity has to offer its energy to the CAISO markets.

3. Resolve the procurement, retail, and cost allocation rules in a manner that allows the Investor Owned Utilities (“IOUs”) to acquire additional new capacity under long-term Power Purchase Agreements (“PPA”).

At this point, the only way for new, competitively priced capacity to get built is for the IOUs to enter into long-term (*i.e.*, 7-10 year) PPAs with competitive power producers that can successfully bring new plants online. Any delays in resolving the policy issues necessary to get the additional PPAs executed and approved increases the risk of another energy crisis. It will take time to get the centralized market designed appropriately and time for the shorter-term market signals to produce their effect. Given the need to initiate new capacity development now to avert shortages of supply in California, simpler and more direct measures must be taken by the Commission to require IOUs to enter into such contracts.

4. Continue to improve the energy and ancillary services markets so that consumers can obtain reliable supply at competitive costs.

Improving the energy and ancillary services markets will have the added benefit of diminishing the financial value of the capacity market relative to the energy market and thus reduce the risk that administrative processes transfer non-competitive costs to consumers. It will also improve the opportunity for demand response to be effective in the market.

5. Over time, move to a multi-year RAR showing to allow the capacity market to go far enough out in time so that new resources can compete for meeting the RAR.

The capacity market should go out far enough in time (3-5 years) so the market price can reflect new entry.

6. Carefully develop a centralized capacity market with a residual demand curve carefully and utilize market mechanisms to the maximum extent feasible.

A centralized capacity market to address residual needs (or load shifting under direct access) and provide transparency will be needed to complete the resource adequacy process.

II. CAPACITY MARKET FRAMEWORK

Keeping in mind that Calpine believes that the key to Resource Adequacy in the foreseeable future is ensuring long-term resource acquisition for new supply to meet California load growth and to ensure that old, inefficient plants can be retired in a timely manner, Calpine offers the following thoughts on the capacity market framework

First, LSE capacity requirements and the capacity product definition should be definitively adopted by the Commission. Until LSEs know exactly what and how much to acquire, there will be uncertainty in the market. Second, market mechanisms should be used to the maximum extent feasible. Third, administrative/regulatory mechanisms should only be used when a reasonable market mechanism is not available. If administrative mechanisms (*e.g.* demand curves) must be used, they should be as simple as needed to accomplish their purpose and they should utilize market information to the maximum extent.

Calpine believes that in the short run, long-term contract procurement is needed to assure that needed generation is timely built. In the long run, there is also a benefit to procure capacity on a forward basis to allow new entry to complete for meeting the RAR. However, there will always be a need for shorter term procurement of residual capacity. The latter step could be accomplished by a capacity market design along the lines of the White Paper. Calpine recommends that this type of capacity market be the goal for a centralized California capacity market.

An essential element in making the capacity market work is to have a proper “backstop” mechanism in place for needed capacity that is not contracted for under the RAR. The Reliability Capacity Services Tariff (“RCST”) as proposed by the Independent Energy Producers Association (“IEP”) in a filing to the Federal Energy Regulatory Commission (“FERC”) is an essential element for having the capacity market work (whether it is bilateral or centralized).

III. RESPONSES TO SPECIFIC ISSUES IDENTIFIED IN THE CHIEF ALJ'S RULING

The Commission has requested comments on the specific items and questions that are listed below. Calpine's proposed comments are in italics. Non-italicized text is from the White Paper.

1) "Lessons Learned and Related Policy Questions" outlined in Section VI. E.

A capacity requirement/market may be appropriate to provide a partial stream of revenues in evolving energy markets. Some of the key lessons learned from the existing centralized capacity markets in NYISO, ISO-NE, and PJM are:

1. A vertical demand curve causes unwanted volatility in revenues, and exacerbates market power in the capacity market. A sloped demand curve mitigates these problems.

Calpine's Comment: These statements are true. However, Calpine is recommending that initially, the Commission focus on getting the LSE-based RAR market right and on long-term procurement for new capacity. In the bilateral capacity market the volatility can be mitigated by utilizing an RCST as proposed by IEP in its filing at FERC.

2. Capacity markets should use locational resource targets that account for transmission constraints.

Calpine's Comment: Calpine agrees. Although again it should be emphasized that the energy market, not the capacity market, should be the long-term goal for where all value, including locational, is compensated.

3. Bilateral capacity markets should be accompanied by a centralized market that provides for smaller LSEs. This does not interfere with bilateral contracting and can increase the efficiency and reduce the market power in bilateral markets.

Calpine's Comment: Calpine believes that an effective bilateral market that includes a standardized capacity product needs to be the top priority in the near term (along with long term contracts for new supply). Centralized markets can and should follow.

4. The ICAP demand curve should account for peak energy-market revenue.

Calpine's Comment: In a bilateral market there is no need to debate this issue. Competition in the market will assure there is no double payment for capacity. However, if a demand curve is used, the peak revenue adjustment should be done ex ante.

5. Capacity should not be defined as name-plate capacity, but should be adjusted for performance.

Calpine's Comment: *Calpine strongly agrees. This also points out that the capacity should only come from specific physical generators, not system sales types of contracts. It is then appropriate to adjust the capacity of the generators for actual performance.*

6. The demand curve should be designed so the fixed-cost recovery is somewhat above normal when installed capacity is short of the target adequacy level and below normal when installed capacity is above this level.

Calpine's Comment: *This is the correct description for a demand curve. However, Calpine is recommending that initially, the Commission focus on getting the LSE-based RAR market right and on long-term procurement for new capacity. Then move to a centralized capacity market.*

Policy questions for California from the experiences from other states and ISO/RTOs include:

1. Would a downward sloping demand curve capacity market construct, similar to the New York approach, be an appropriate mechanism to support California's resource adequacy program?

Calpine's Comment: *As a centralized market is developed, a structure along the lines of the New York approach is appropriate. However, Calpine is recommending that initially the Commission focus on getting the initial RAR process effective and long-term contracts for new supply.*

2. Would a capacity market, such as in New York, assist LSEs to make adjustments by being able to sell excess capacity or buy it when they are short?

Calpine's Comment: *Calpine recommends that the Commission establish a standardized capacity product to facilitate making adjustments. This standardized product could then be traded while the centralized capacity market is developed. SVLG, PG&E and WPTF have all proposed products that the Commission could use as the basis for establishing this product.*

3. Would this mechanism assist California in meeting its goals to be resource adequate and reach a minimum of 15-17% reserve margins?

Calpine's Comment: *The key to meeting this requirement, in the near term, is to get long term procurement contracts done for new capacity and to make sure the initial RAR process strongly supports needed existing capacity. It will take time to develop a centralized capacity market to accomplish this goal.*

4. To address deliverability concerns and meet the ISO's requirements, is it appropriate to investigate solutions for local areas as a first step?

Calpine's Comment: *Yes, requirements for local areas are an essential ingredient for a useful capacity market.*

5. Do capacity markets in local areas that are designed with downward sloping demand curves significantly mitigate energy and capacity market power concerns? What are other appropriate steps (e.g. subtraction of peak energy rents)?

Calpine's Comment: *This bilateral local capacity market combined with the RCST as proposed by the IEP filing at FERC should be the initial approach for resource adequacy. The RCST is sufficient to mitigate local market power until the centralized local capacity market is carefully implemented.*

2) **Staff's recommendations outlined in Section VII**

Recommendation 1: Adopt a short-run organized capacity market approach with a downward sloping capacity-demand curve for the CAISO.

Calpine's Comment: *Calpine is recommending that initially, the Commission focus on getting the LSE-based RAR market right and on long-term procurement for new capacity. Calpine supports the development of a centralized capacity market along the lines of that described in the White Paper, but it should not be distracted from these higher priorities.*

Recommendation 2: Further investigate alternative availability metrics (e.g. UCAP v. ISO-NE's proposed metric based on performance during shortage conditions) and ensure development of an availability metric that is applicable to hydro, wind, thermal and other generation technologies, and to appropriate demand response products.

Calpine's Comment: *This is an important recommendation, but it needs to be broadened. **The first and most critical step in establishing a capacity market is to define the product that is to be bought and sold in that market.** It is critical to the success of the capacity market that the definition is for a simple, standardized product that is for specific physical, deliverable generation. The availability obligation of the resource needs to be simple, clearly defined and consistent for all resources. Finally, in direct response to this recommendation, the metrics for measuring performance needs to be evaluated and settled.*

The statement on page 40 of the White Paper, “[f]or example a thermal resource that takes 24 hours to start may provide only half the reliability of a quick-start unit.” does not seem to be correct or is not clear. A unit that takes longer to start up may be just as reliable as a quick start resource. The startup speed does not indicate the reliability of the resource. The Commission will need to clarify this point.

Recommendation 3: Consider subtraction of peak energy rents from the capacity payment.

Calpine's Comment: *This issue need not be dealt with in a bilateral capacity market. This is one of the advantages of starting out with the bilateral market approach as Calpine is recommending. As a centralized capacity market with demand curve evolves it may be necessary to do this subtraction and if so, it should be ex ante.*

Recommendation 4: Adopt reasonable locational installed capacity requirements with locally varying demand curves.

Calpine's Comment: *Local installed capacity requirements are essential to a properly functioning capacity market. A demand curve is not needed in the bilateral*

market approach that Calpine recommends be the near term focus. The RCST would be the mitigation for local market power.

The local requirement should reflect all the criteria the CAISO currently use to establish the need for local generation. Thus the capacity market for that zone should attempt to capture all capacity that the CAISO will need for local reliability.

With regard to the specification of zones, the initial implementation of the capacity market should attempt to balance the burden of having numerous small zones with the need to have the local capacity market precisely define the needed generation. For the initial capacity market some aggregation may be needed to provide a practical market for implementation. New York has three “zones” and as a practical matter the California market may not be able to handle many more.

Recommendation 5: Consider protecting against capacity exports during times of tight supply through the use of capacity prices that fluctuates seasonally.

Calpine’s Comment: *This is a good recommendation. The key point will be to balance the complexity of administering a number of time periods with the value of a more precise definition of the capacity need. Calpine recommends a seasonal or monthly approach for the initial capacity market.*

Recommendation 6: Investigate the dependability of capacity import contracts during times of high West-wide load.

Calpine’s Comment: *This is an important area that needs additional investigation. It should be a basic principle of the capacity market that the requirements placed on imports as well as the compensation to imports is comparable to those for internal resources. The statement from Page 41 of the White Paper that “it may be necessary to develop special requirements for capacity import contracts, such as higher penalties for default, and/or a different price-setting mechanism than that used for internal capacity contracts” is concerning.*

Recommendation 7: Make the fixed-cost recovery curve explicit.

Calpine’s Comment: *Calpine is recommending that initially, the Commission focus on getting the LSE-based RAR market right and on long-term procurement for new capacity; while careful development of the centralized market is underway as a lower priority.*

Recommendation 8: Strive for regulatory credibility.

Calpine’s Comment: *One of the most important actions needed to motivate new investment in California generation is regulatory credibility. When developers, investors, and lenders are confident in the credibility of the regulatory process for the California electric market - needed investments in that market will be forthcoming.*

The considerations mentioned in the White Paper are all valid and important. Calpine would suggest adding the following additional consideration: Let the market work once you have set it – resist the temptation to intervene the first time prices may

go high. As correctly stated on page 12 of the White Paper “Regulatory risk translates into higher investment costs.”

Calpine’s recommendation to start with the bilateral market for now is consistent with regulatory credibility. The Commission has been working on this market structure for over a year and a half. It is just about to issue its order implementing this LSE-based capacity market. This approach should at least be underway before the Commission embarks on yet another major market structure activity. Sticking to this current approach until it has at least been tested will enhance regulatory creativity.

3) Appropriate roles and responsibilities of the Commission and CAISO in the development, design, and potential implementation of capacity markets in California outlined in Section VIII;

Implementation of the capacity market needs to be done with a well structured, high quality plan jointly promoted by the Commission and the CAISO:

- **The Commission and CAISO should put forth a *single* vision for a capacity market and how it will be implemented.** The Commission and CAISO are the lead agencies for the state in this effort and the success of implementing a capacity market in a timely manner hinges on the state putting forward a single consistent plan. If the state does not do this, then the implementation will take much longer.
- **The Commission and CAISO should *jointly* hire world-renowned experts to develop the next steps for the capacity markets.** It is critical for the timely implementation of a capacity market that the state put forward a highly credible proposal for a capacity market and a plan for its implementation.
- **The process for obtaining stakeholder input on the Commission and CAISO proposal should be rigorous so as to assure a high quality final decision.** The proposal should then be reviewed as part of a CAISO/FERC process with formal evidentiary hearings to assure high quality of information is used to make the decisions.

In addition to the above comments, Calpine offers the following comments on the tasks listed in Section VIII.C, entitled “The extent to which the Commission should establish capacity market elements remains an open question.” Generally, Calpine believes it would be best for the CAISO to take the lead on those tasks that get into the details of the market design and the Commission to be the lead on the overarching reliability and cost parameters for the market design. Specifically, the Commission should lead items 1 and 2 and the CAISO items 3 - 7:

1. Identify a reliability criterion such as a 1-day in 10-years loss of load expectation and translate this to a reserve margin objective - Commission lead agency.

2. Choose a maximum capacity for pricing that represents the maximum price one is willing to pay, even when short - Commission lead agency.
3. Choose the maximum capacity (i.e. zero crossing point) – CAISO lead agency.
4. Examine the historic variability (standard deviation) of capacity – CAISO lead agency.
5. Calculate a Capacity Target for the specific market – CAISO lead agency.
6. Calculate/estimate the cost of capital for the lowest-cost capacity – CAISO lead agency.
7. Draw the demand curve based on varying sets of assumptions stated above – CAISO lead agency.

IV. CONCLUSION

Calpine appreciates the opportunity to comment on the White Paper and looks forward to working with the Commission and other stakeholders to ensure the needs of California's electric customers are met and that any future energy crisis is avoided.

Respectfully submitted,

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Dated: September 23, 2005

CERTIFICATE OF SERVICE

I, Judy Pau, certify:

I am employed in the City and County of San Francisco, California, am over eighteen years of age and am not a party to the within entitled cause. My business address is One Embarcadero Center, Suite 600, San Francisco, California 94111-3834.

On September 23, 2005, I caused the following to be served:

**COMMENTS OF CALPINE CORPORATION
ON CAPACITY MARKETS WHITE PAPER**

enclosed in a sealed envelope, by first class mail on the parties listed as “Appearance” and “State Service” on the attached service list who have not provided an electronic mail address, and via electronic mail to all parties on the service list who have provided the Commission with an electronic mail address.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on the date above at San Francisco, California.

/s/ Judy Pau
Judy Pau

Service List R.04-04-003
Jack Fulcher, Energy Division

CALIFORNIA PUBLIC UTILITIES COMMISSION

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