

**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 and Flexible Procurement
Obligations for the 2016 and 2017
Compliance Years.

Rulemaking 14-10-010
(Filed October 16, 2014)

**COMMENTS OF THE
CALIFORNIA WIND ENERGY ASSOCIATION
ON PROPOSED DECISION ADOPTING LOCAL AND FLEXIBLE CAPACITY
OBLIGATIONS FOR 2018 AND REFINING THE RESOURCE ADEQUACY PROGRAM**

Dariush Shirmohammadi
Technical Director
California Wind Energy Association
1700 Shattuck Ave., #17
Berkeley, CA 94709
Telephone: (310) 858-1174
E-mail: dariush.shirmohammadi@gridbright.com

Nancy Rader
Executive Director
California Wind Energy Association
1700 Shattuck Ave., #17
Berkeley, CA 94709
Telephone: 510-845-5077 x1
E-mail: nrader@calwea.org

*On behalf of the California Wind
Energy Association*

June 14, 2017

**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 and Flexible Procurement Obligations for the 2016 and 2017 Compliance Years.

Rulemaking 14-10-010
(Filed October 16, 2014)

**COMMENTS OF THE
CALIFORNIA WIND ENERGY ASSOCIATION
ON PROPOSED DECISION ADOPTING LOCAL AND FLEXIBLE CAPACITY
OBLIGATIONS FOR 2018 AND REFINING THE RESOURCE ADEQUACY PROGRAM**

I. INTRODUCTION

Pursuant to the May 25, 2017, notice of Chief Administrative Law Judge (“ALJ”) Karen Clopton, the California Wind Energy Association (“CalWEA”) submits these comments on the Proposed Decision of ALJ Peter Allen Adopting Local and Flexible Capacity Obligations for 2018 and Refining the Resource Adequacy Program (“Proposed Decision” or “PD”). CalWEA’s comments focus solely on the issue of implementing the Effective Load Carrying Capacity (“ELCC”) methodology for wind and solar resources.

II. COMMENTS

CalWEA supports the Proposed Decision on the implementation of the ELCC methodology as a major step forward over current practice, noting however the serious shortcomings in the PD’s rationale supporting a particular provision of the methodology for use in the 2018 RA year.

Specifically, the PD simply declares that Energy Division’s alternate proposal to remove the influence of behind-the-meter (“BTM”) solar “has a stronger analytical basis” without explaining what that basis is. Nor does the PD respond to other parties’ arguments that the only basis provided by any party for removing BTM solar is the desire to reduce the impact of the ELCC methodology on LSEs’ RA requirements without regard for the purpose of RA capacity, which is to ensure system reliability.¹

Nevertheless, CalWEA can support the decision because the methodology and values it adopts for 2018 are a marked improvement over the current arbitrary and completely inaccurate values based on the exceedance methodology, and because the PD states (at p. 20) that it is “not directing the use of a particular model for future ELCC determinations” and (at p. 21) that “the process used to calculate monthly ELCC values will be subject to improvements, refinements and changes as needed.” We look forward to accomplishing those improvements for the 2019 RA year.

Respectfully submitted,

/s/ Nancy Rader

Nancy Rader
Executive Director
California Wind Energy Association
1700 Shattuck Ave., #17
Berkeley CA 94709
Telephone: (510) 845-5077
Email: nrader@calwea.org

***On behalf of the California Wind Energy
Association***

June 14, 2017

¹ See CalWEA Comments on Final Phase 3 Proposals at p. 3; CalWEA Reply Comments on Final Phase 3 Proposals at p. 3; and Calpine’s Comments on Final Phase 3 Proposals at 11-12.

VERIFICATION

I, Nancy Rader, am the Executive Director of the California Wind Energy Association and am authorized to make this Verification on its behalf. I declare under penalty of perjury that the statements in the foregoing *Comments of the California Wind Energy Association on Proposed Decision Adopting Local and Flexible Capacity Obligations for 2018 and Refining the Resource Adequacy Program* are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 14, 2017, at Berkeley, California.

/s/ Nancy Rader

Nancy Rader
California Wind Energy Association