

**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)

**PREHEARING CONFERENCE STATEMENT OF THE  
CALIFORNIA WIND ENERGY ASSOCIATION**

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

December 2, 2015

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Pursuant to the November 17, 2015, ruling of Administrative Law Judge Kevin Dudney Setting Prehearing Conference (“Ruling”), the California Wind Energy Association (“CalWEA”) respectfully submits these prehearing comments on the scope and schedule for the above-captioned proceeding.

With regard to the establishment of Net Qualifying Capacity (“NQC”) values for wind and solar resources consistent with the Effective Load Carrying Capacity (“ELCC”) methodology, we urge the Commission to closely coordinate this effort with the determination and use of ELCC values in the Renewables Portfolio Standard proceeding (R.15-02-020). In that proceeding, Energy Division staff has proposed that the investor-owned utilities (“IOUs”) develop a uniform approach to the use of the ELCC method for determining the capacity value of variable renewable resources in their procurement processes.<sup>1</sup> In response, many parties urged that ELCC methods used in procurement be coordinated with the ELCC methods used for RA purposes, and that a single ELCC methodology be applied consistently across CPUC proceedings.<sup>2</sup> For example, San Diego Gas & Electric (“SDG&E”) expressed concern that “the selected supply offers under the ELCC methodology proposed by the ED would have different Qualifying Capacity than would ultimately be realized for RA compliance purposes.”

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<sup>1</sup> See R.15-02-020, October 9, 2015, Ruling of Administrative Law Judge Anne Simon, and accompanying *Energy Division Staff Paper on Criteria for ELCC in LCBF Analysis for RPS Procurement*, dated October 2, 2015.

<sup>2</sup> SDG&E’s summarized parties’ views on this point in their November 6, 2015, comments.

In its comments, CalWEA noted that ELCC-based Qualifying Capacity (“QC”) values calculated for a specific resource will change over time as more resources with similar characteristics interconnect to the system, and that constantly changing values could lead to an unmanageable process that would make it difficult, if not impossible, to properly account for the impact of a proposed resource on system reliability. To address this situation, CalWEA proposed that the Commission establish a definitive cutoff date for switching to ELCC-based methods for all CPUC proceedings, and that a resource’s ELCC-based QC, once established, remain the same (or change infrequently).<sup>3</sup>

Because of the important interrelationships of assigned capacity values across proceedings, it is important that the Commission and the parties consider all (or at least some of the most important) uses of the ELCC methodology simultaneously. Therefore, CalWEA proposes that joint workshops between the RA and RPS proceedings (if not others in addition) be held in this topic area, with joint comment processes and decisions as warranted.

Respectfully submitted,

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<sup>3</sup> See R.15-02-020, October 23, 2015, Comments of CalWEA on the use of ELCC in RPS Procurement.