

## **Electricity Supply Plan Forms and Instructions – What's New for 2011**

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This brief summary highlights changes to data collection categories and related instructions. The majority of Excel form categories and corresponding instructions are unchanged from 2009. This summary is prepared for the staff workshop on forms and instructions set for 2 p.m. on Friday, **November 19, 2010**.

### **Who Files What by When**

LSEs are expected to file completed supply resource forms by Friday, **April 29, 2011**. (The draft instructions propose an April 15, 2011 due date. However; the due date for demand forecast forms will likely be changed from April 1 to April 15, 2011. An interval of at least two weeks between these due dates is essential.) For 2011, we still ask for historic energy supply for two prior calendar years, and we expect this data for calendar year 2010 will be a reasonable, good-faith effort. Settlement quality data is expected for calendar year 2009.

Written comments on draft forms and instructions should be submitted by Wednesday, **November 24, 2010**. The Energy Commission may consider adoption of forms and instructions at the December 15, 2010 Business Meeting.

**The same number of LSEs will be required to submit supply forms** as in 2009, and the forecast periods will be similar. For the 13 POUs and 3 IOUs that had peak loads over 200 MW in either 2009 or 2010, we again require a 10-year forecast of loads and resources; the forecast horizon is 2011 through 2020. (As in 2009, small IOUs PacifiCorp, NV Energy, Bear Valley Electric, and Mountain Utilities will not required submit any data.) We will again request a 10-year forecast from CDWR and NCPA (scheduling coordinator and resource planner for the NCPA Power Pool with 10 small POUs). And for several purposes, we will ask the City of Vernon to provide a ten-year forecast comparable to that city's 2009 submittal even though Vernon's annual peak loads were less than 200 MW in 2009 and 2010.

ESPs that had peak loads higher than 200 MW will submit historic supply data for 2009 and 2010. Their five-year forecast horizon is 2011 through 2016. We expect 5 ESPs to again submit resource plans: Constellation Energy, Sempra Energy Solutions, Shell Energy North America, Direct Energy Services, and Pilot Power Group. (As in 2009, small ESPs – now about eight in number – will not be required to submit any data.)

Small POUs will submit 2009 and 2010 historic data plus a forecast of loads and resources for 2011 only. Small POUs will again be required to submit actual hourly loads for the most recent year (2010) in lieu of filing any demand forms. Many POUs submitted supply forms in 2009 for the first time. For those that filed late in 2009, we expect to follow-up more quickly and vigorously in 2011.

As in 2009, each contractual supply resource with durations over 91 days must be summarized on supply Form S-5. Based on 2009 submittals, we expect about 650 such forms total, plus comparable information from NCPA on about 160 contracts in table format.

### **Improvements to Instructions and Supply Forms for 2011**

Draft instructions for 2011 are 46 pages compared to 64 pages adopted for 2009. Six pages of background information and definitions have been moved to a new appendix so that actual instructions for resource planners now begin on page 3.

#### **Several lines asking for adjustments to the forecast peak-hour demand and forecast annual energy demand (on forms S-1 and S-2) have been deleted.**

The supply forms still retain lines for "Uncommitted Energy Efficiency" (line 3, for 2013 and beyond), and for dispatchable "Demand Response / Interruptible Programs" (line 4). On the demand forecast Form 1.7a and 1.7d, LSEs are asked to estimate local private supply that is reasonably expected to occur for various programs and technologies including CSI, SGIP, DG, and CHP. To reduce duplicative reporting requirements, similar lines have been deleted from the supply forms. Demand forecast Form 1.1 asks LSEs to list "Migrating / Newly Served Load" so duplicative lines on this topic have also been deleted from the supply forms.

#### **All LSEs will again provide Form S-1 showing capacity (MW) loads and resources.**

Instructions reaffirm the data request for LSEs to use dependable or Net Qualifying Capacity (NQC) ratings. For LSEs in the California ISO balancing area, this request to use recently posted NQC values for wind and solar resources agrees with CPUC resource adequacy protocols for the IOUs and ESPs.

For 2009 and 2010, we clarify that we also want dependable or NQC values for the resources LSEs expected to be available for peak load in those years. We do not expect LSEs to investigate and report what each resource was actually producing during the balancing area coincident peak. Such a request would be unreasonable and not particularly useful.

Below the main body of Form S-1 there is a small table for "**Historic LSE Peak Load**" data for 2009 and 2010. To get a more accurate tally of actual peak load that was met with local DG and

self-gen, plus load that was not served due to major outages (as occurred on September 27, 2010 in the Los Angeles area), lines 31 and 32 are new this year.

**In general, the 2011 supply forms in Excel are simpler, shorter, and easier to complete.** These forms will also be and easier for CEC staff to verify, asses, and compile. Basic formats and organization is unchanged from 2009. A new “Admin Info” tab is information about who prepared the supply forms, when they were completed, and appropriate contact information. (This used to appear repetitively at the top of each supply form.)

In 2011 we expect closer correspondence between individual supply resource names as they appear on Forms S-1, S-2, and S-5. (Multiple units may be combined on one form but not others according to utility preference and convention such as LADWP’s Haynes 8, 9 & 10 CC.) To that end, we have added a cell for “Contract Name” to the top of Form S-5, and we now ask that contractual resources named on Forms S-1 and S-2 include the supplier name (in parentheses). **For utility-owned fossil fuel resources, and utility-owned renewable resources, and contractual resources,** we ask each listing on Form S-1 and Form S-2 to first **state the fuel type.** Thus, one of Banning’s contracts would be shown as “geothermal: Heber South (SCPPA).” For a Truckee Donner contract, it would be “wind: Pleasant Valley (UAMPS).” This new requirement will facilitate data compilations and supply trend assessments for the 2011 IEPR and staff reports.

All LSEs will again provide Form S-2 showing energy requirements (GWh) for calendar years and a listing of all supply resources including actual volumes in 2009 and 2010.

**Planned and generic resource additions are now better distinguished.** The energy totals on Form S-2 line 17 include all existing and planned resources. We clarify an expectation that all planned contractual resources listed on Form S-1 and S-2 will have a corresponding Form S-5. For major wind, solar, and geothermal projects, this would means “an indentified location and/or supplier even if permitting or financing are not yet underway. To be listed in this section as a planned resource, contract negotiations must be well advanced, and this listing must be matched to a reasonably complete bilateral contract S-5 form.” If a project does not meet these general criteria, LSEs are expected to include it as a “generic” renewable energy need on line 20 of Form S-2.

Below the main body of Form S-2 there is a small table for **“Renewable Energy Accounting.”** The data request is for 2009, 2010, and all required forecast years. This table now has 12 lines compared to 8 lines in 2009, of which 7 lines are auto-sum or “copy-paste” formulas. For example, Utility-Controlled Small Hydro on line 22 repeats line values entered on line 10c.

The new lines for renewable energy accounting will facilitate sums and aggregations by various eligibility criteria. We have added line 23 specifically for LSEs to enter any **Other Hydroelectric Energy Deemed Renewable** by statutes or locally adopted criteria. (This would include renewable energy from large hydroelectric resources, such as utility-owned shares of Hoover generation for Riverside, and energy from Owens Valley Gorge and Los Angeles Aqueduct power plants for LADWP.)

Also new is line 28 for “**Private Supply Renewable Resources**” to the extent the LSE has or expects to have contractual agreements or interconnection protocols in place that convey ownership of renewable attributes (RECs) to the LSE.”

**Instructions for Other LSE-Defined Renewable Energy on line 27 have been modified.**

Specific examples have been added such as LADWP’s procurement of digester gas for combustion in Scattergood. Since these non-standard claims always draw scrutiny, we ask for a note of explanation for each listing as needed for clarity.

**Line 29 is also new in 2011: Tradeable REC Purchases.** Since this topic unsettled or conflicting administrative policies and has had significant public controversy, our instructions to LSEs are general: “**A forecast of such purchases should include the LSE’s assumptions about statutory and regulatory conditions in the future**, and the extent that RPS targets can be met or might best be met through REC purchases. Do not include tradeable RECs purchased as part of a green energy marketing program with voluntary customer participation.”

**Supply Forms S-1 Monthly and S-2 Monthly are retired.**

In 2009 we required all LSEs to provide Form S-1 Monthly and Form S-2 Monthly for one forecast year. We will not be asking for any monthly forecasts of loads and resources in 2011.

**Supply Form S-4 on Wind Project Resources is new this year.**

LSEs with existing or planned wind resources will be asked to identify the physical location of these projects, to name the point of interconnection, and to provide contact information for the project owners. This form also asks LSEs to report their shares of nameplate and dependable capacity.

This information will help to assess trends and expectations for instate out-of-state procurement. Ownership contact information will help augment reporting as required by the Quarterly Fuel and Energy Reports regulations.