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IEPR JOINT AGENCY WORKSHOP  
BEFORE THE  
CALIFORNIA ENERGY COMMISSION

In the Matter of: )  
)  
*2021 INTEGRATED ENERGY POLICY* ) Docket No. 21-IEPR-04  
*REPORT (2021 IEPR)* )  
\_\_\_\_\_ ) RE: Reliability

JOINT AGENCY WORKSHOP ON  
SUMMER 2021 ELECTRIC AND NATURAL GAS RELIABILITY

REMOTE ACCESS WITH ZOOM  
THURSDAY, JULY 08, 2021  
2:00 P.M.

Session 2: Imports, Demand Response, and Multi-year Outlook

Reported by:  
Martha Nelson

## APPEARANCES

### Workshop Leadership

Andrew McAllister, CEC  
Siva Gunda, CEC  
Karen Douglas, CEC  
Patty Monahan, CEC  
Marybel Batjer CPUC President  
Marth Guzman Aceves, CPUC  
Clifford Rechtschaffen, CPUC  
Elliot Mainzer, California ISO, President and CEO

### Staff Present:

Heather Raitt, CEC Program Manager

### Presenters:

Mark Rothleder, California ISO  
Marci Palmstrom, Southern California Edison  
Scott Ranzal, PG&E  
Steven Pruet, Los Angeles Department of Water and POWER  
(LADWP)  
Timothy Vigil, Western Area Power Administration  
Mark Koostra, CEC

### Public Advisor:

RoseMary Avalos

### Public Comment:

Issam Najm  
John White, Center for Energy Efficiency and Renewable  
Technology

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P R O C E E D I N G S

1 JULY 08, 2021 2:00 p.m.

2 MS. RAITT: Okay. Well, good afternoon,  
3 everybody. Welcome to Session 2 of this Joint Agency  
4 Workshop on Summer 2021, Electric and Natural Gas  
5 Reliability. I'm Heather Raitt, the program manager for  
6 the Integrated Energy Policy Report, or IEPR for short.  
7 This is the first day of a 2-day workshop. And the  
8 workshop is being held remotely consistent with Executive  
9 Order N-08-21 to continue to help California respond to,  
10 recover from, and mitigate the impacts of Covid-19  
11 pandemic. The public can participate in the workshop  
12 consistent with the direction and the executive order. To  
13 follow along with today's discussion, the workshop schedule  
14 and presentations are available on the Energy Commission's  
15 website. All IEPR workshops are recorded and with a  
16 written recording and other recording are going to be --  
17 written transcript and audio recording, excuse me, will be  
18 linked to the Energy Commission's website in a couple of  
19 weeks. Attendees have the opportunity to participate today  
20 a few different ways. One is by asking questions through  
21 the Zoom Q&A feature, and you can upvote questions by  
22 clicking the thumbs up. Or you can make comments during  
23 the public comment period at the end of the afternoon, or

1 you're welcome to submit written comments, and those are  
2 due on July 23rd. And the meeting notice gives you all the  
3 information for doing that.

4 So with that, I'm pleased to turn it over to  
5 Commissioner Siva Gunda. Thank you. Commissioner, we  
6 can't hear you.

7 COMMISSIONER GUNDA: Thank you, Heather. Yeah,  
8 thank you. Double mute. So I had to do it. So just want  
9 to ask if Commissioner McAllister wanted to have any  
10 opening statements and then I will kind of just tee up the  
11 afternoon session. Commissioner, you are muted too.  
12 Double mute.

13 COMMISSIONER MCALLISTER: There we go. That  
14 should work . Yeah. Thank you, Commissioner Gunda.  
15 Really just want to welcome everyone again and, you know,  
16 to our part two of the first of two days on Reliability or  
17 Electricity and Natural Gas Systems within the Integrated  
18 Energy Policy Report series on Reliability. And so we  
19 introduced the context in depth this morning and I won't go  
20 into that again. But I just want to thank everyone for  
21 tuning in again this afternoon. Seeing really good  
22 attendance, so thank you all.

23 And also, I just wanted to make a little bit of  
24 an exhortation to please, please comment today and submit  
25 comments on anything you deem relevant. I'm talking here

5

1 to the attendees related to reliability. This is our, you  
2 know, really the number one issue of this summer, and  
3 beyond, and well beyond, and you know, years to come, but  
4 we really, I think, need to build a robust dialogue as  
5 broadly and deeply as possible going forward. That's our  
6 system, it will inoculate, you know, will be, will improve  
7 its resistance against all challenges if we have a robust  
8 process that make sure to be anticipatory and we need help  
9 with that. We need help across the board with that.

10 We have a lot of collaboration across the  
11 agencies, as we heard this morning, and will again today,  
12 or this afternoon, but you know, the more perspectives we  
13 bring to the table, the more inclusion the process can  
14 embrace, the better we're all going to be, the more  
15 critical thinking we get and the better we're all going to  
16 be as Californians and across the West. So with that, I  
17 think just to put a finer point on the need for  
18 participation, and please do submit your comments once  
19 you've heard the sessions today and tomorrow. And Heather  
20 will give you all the details about how to go about doing  
21 that. But just wanted to make sure to say that. So and  
22 back to you, Commissioner Gunda. Thank you very much, for  
23 your leadership.

24 COMMISSIONER GUNDA: Thank you, Commissioner  
25 McAllister. So again, just quickly, you know, thanks

1 everybody for being here. You know, CEC has an important  
2 role of ensuring a robust public process and important  
3 topic. So your participation and to all the panelists, you  
4 know, for your time, this is what makes the, this process  
5 robust and comprehensive and useful to the state. So just  
6 that, thanking everybody

7           Just a quick overview of what we're going to do  
8 this afternoon. You know we had a really good discussion  
9 on hydro and how do we think about hydro moving forward  
10 this morning? An excellent conversation. This afternoon,  
11 you know, we're going to be kicking off with Mr. Rothleder  
12 leading a panel, similar to what we did in the morning on  
13 Hydro. This will be on Imports, and how to think about  
14 imports in the short term during the net peak hours and in  
15 the future. And that presentation will follow -- will be  
16 followed by staff presentations by CEC, specifically  
17 looking at, you know, other important resources that we  
18 need to be tackling. You know, that, are the three things  
19 that we've been thinking through at CEC. We have the  
20 Imports, we have the Hydro as we think about the future,  
21 but also demand response. And then how do we think about  
22 demand response moving forward? In the decision on June  
23 24th, CPUC has asked the CEC to hold a stakeholder process  
24 to inform how to account for DR in the Resource Program,  
25 again Resource Adequacy Program, again highlighting the

7



1 collaboration that we all have ongoing to ensure  
2 reliability. So that's we're going -- we're going to just  
3 tee that up. Discussion would love to hear comments from  
4 stakeholders. And then we'll move into another, you know,  
5 collaboration between CEC and CPUC. I'm thinking through  
6 the mid-term reliability, '23 to '26. And then how does  
7 the outlook look? You know, if you look at the LOLE  
8 Analysis under different conditions, and staff will present  
9 some information on that as well. So with that, thank you  
10 all for being here. And I would want to open up to the  
11 dais if anybody else want to make any comments.

12 Seeing -- oh yeah, Commissioner Douglas.

13 COMMISSIONER DOUGLAS: Oh, no. No comment from  
14 me. Thank you.

15 COMMISSIONER GUNDA: Okay. Thank you. I don't  
16 know. Elliot, would you have any comment?

17 PRESIDENT MAINZER: No. I'm just fine. Thank  
18 you, Commissioner. Ready to go.

19 COMMISSIONER GUNDA: Okay. Thank you so much.  
20 Back to you, Heather.

21 MS. RAITT: Great. Thank you, Commissioner.  
22 Okay. We'll start with a panel On Import Planning for Time  
23 of System Net Peak. And it's being moderated by Mark  
24 Rothleder, from the California ISO. Mark is the senior  
25 vice president and chief operating officer at the

1 California ISO who's leading a cross-functional team that  
2 integrates policy planning, operations and technology. And  
3 before being named in his current position, Mark served as  
4 the vice president of Market Policy and Performance. Thank  
5 you for being here, Mark. Go ahead.

6 MR. ROTHLEDER: Thank you, Heather. And thank  
7 you, Commissioner Gunda, for inviting me to moderate this  
8 panel. I'm going to do a quick presentation just going  
9 over some observed trends regarding Imports, and then I'll  
10 introduce probably a few questions for -- that our  
11 panelists will incorporate into their presentation or their  
12 material. So if you can go to the next slide, I'll just go  
13 jump into the -- my presentation.

14 So historically, the California and the  
15 California ISO has been a net importer. I don't think  
16 that's a surprise. What's happened over the last few  
17 years, though, well, we're a net importer and we rely about  
18 25% of our energy needs are come from imports. As supply  
19 and demand conditions have changed in California and across  
20 the West, we are observing some fairly significant changes  
21 in the trends of imports. While the overall energy still  
22 remains around that 25% mark, we're seeing more impactful  
23 changes in terms of the availability and -- of imports  
24 during high load or high net load conditions.

25 So what you're looking at here, in terms of the

1 first slide here, is just some trends, first off of the net  
2 load. And a reminder, net load is load minus wind minus  
3 solar. And the reason we focus on that is because it is  
4 the -- it's the remaining balance that we have to balance  
5 the system with, including imports. And you can see here  
6 over the trend since 2013, with the addition of renewables,  
7 the net load is getting lower and lower, especially during  
8 midday, midday periods in the spring. So this is -- these  
9 pictures of these graphics are really just a full year  
10 representation of what the net load is over the -- over  
11 those respective years.

12           The next row is the imports. And you can see  
13 here as well, this is the net imports. And so in 2013,  
14 we're running probably around between 5,000 and 10,000  
15 megawatts of net import. And the band was relatively  
16 tight. And now as we again have additional renewables,  
17 we're seeing the spread, or the range of net imports  
18 significantly change and widen. In fact, you can see here  
19 that we're starting to see springtime periods where we're  
20 not a net importer anymore, we're actually a net exporter  
21 of energy when we have surplus, midday surplus of renewable  
22 energy.

23           But the upper end, if you just look at these  
24 graphs, seem to indicate that we're still getting around 9  
25 to 10,000 megawatts on the upper end. What's interesting

1 is if you start graphing the relationship between the net  
2 import as a function or relative to the net load. And  
3 that's what these last set of graphs are illustrating. And  
4 I know it's hard to see, but I'm only wanting you to focus  
5 on the shape and the shape indicates that the trend lines,  
6 whereas before you'd, at higher load you'd just have higher  
7 amount of net imports supporting the higher loads, you  
8 start to see a curve off where above a certain level of net  
9 load, where you get to higher net load levels, the net  
10 imports start to actually reduce and taper off. And that's  
11 a concern because that is the time when we would most need  
12 the energy during those high net load periods, but it looks  
13 like we are experiencing observations where the  
14 availability of that net imports is actually decreasing as  
15 the net load increases.

16           And the next slide, if you go to the next slide,  
17 kind of more is more pronounced and clearly identifying  
18 that the overall trend line of the average imports during  
19 summer conditions, June through September during that 6:00  
20 to 7:00 p.m. period. is a decreasing trend while the range  
21 is widening somewhat and in fact, it's even in the summer  
22 period, we're getting very close to actually net exporting  
23 at times, probably mid-day when the loads are relatively  
24 low, but there's plenty of renewable supply.

25           I'll just make a point here that this last week,

1 last Monday, when the Northwest was at very high  
2 temperatures and high loads, we were, this is the first  
3 time I've seen summer conditions in the middle of the day,  
4 we were actually net exporting out to the system to help  
5 support the Northwest by about a thousand megawatts during  
6 that time. Fortunately, the loads were lower in  
7 California, we weren't under as stress conditions, and we  
8 were able to support that. But it kind of raises the  
9 question is what happens when both the rest of the West is  
10 -- has high loads and high temperatures, as well as  
11 California having high temperatures and high loads? And  
12 that's the concerning part of this discussion.

13           If you go to the next slide, it just gives an  
14 illustration that of these imports, a large portion of them  
15 are contracted under Resource Adequacy. And we rely on the  
16 Resource Adequacy to give us some certainty that we can,  
17 those contracted imports are available to us and we can  
18 rely upon them. But even there, we're seeing a trend at  
19 least year over year relative to the Resource Adequacy  
20 Contracted Imports for the August and July period, we're  
21 starting to see a lower amount of contracted RA Imports  
22 relative to 2020 this year. It's premature to know what we  
23 have for September. It is notable that in September of  
24 last year we actually had a fairly robust amount of imports  
25 contracted under RA after the August events, about 8,000

12

1 megawatts were contracted, but we are -- we're not -- we  
2 won't know until next week how much contracted imports  
3 under RA we will have for September time period.

4           So I think that really sets up the observations  
5 and one, the reliance that we have on imports, that the  
6 observations of the tightness of conditions in terms of the  
7 supply and availability of imports and then the trends of  
8 what we're seeing in terms of Resource Adequacy  
9 Contracting. With that in mind, I've asked the panelists  
10 to kind of focus their discussion around, kind of four  
11 questions that I'm asking, and that is, given the  
12 historical reliance on imports and current trends that  
13 we're observing, what are the opportunities and challenges  
14 to contracting for our imports and for Resource Adequacy  
15 more generally, or for energy more generally.

16           And then two, when contracting for imports, what  
17 are the most important characteristics that the load  
18 serving entities are seeking? I know we are observing that  
19 we are shaping those imports to meet that evening peak as  
20 the sun goes down. But I'm interested in if that is  
21 coordinated or seeing in the contracting that shaping  
22 capability of those imports.

23           And the third question is, what are the trends  
24 that you're observing looking forward one to three years  
25 out that may be impacting the availability of imports going

1 forward?

2           And then the last question is, imports and more  
3 generally interchanges are increasingly -- is part  
4 of -- coming up in regional conversations. From your  
5 perspective, what are the, some of the regional  
6 coordination improvements and or considerations,  
7 considerations that should be taken -- taking place to  
8 advance operational planning assumptions regarding  
9 interchanges and imports?

10           So with that, let me introduce the panelists.  
11 Today we've got Marci Palmstrom. Marcia has been with  
12 Southern California Edison for 18 years and is currently  
13 the director of Trading and Marketing Operations. She  
14 provides oversight of bidding and scheduling of Southern  
15 California Edison's Power resources and expected energy  
16 demand into the wholesale energy market, as well as  
17 transactions for natural gas, power and emission products.

18           Next, you'll hear from Scott Ranzal. Scott is  
19 the director of Portfolio Management at PG&E. Scott has  
20 worked at PG&E for 13 years, serving in different roles  
21 related to finance and risk.

22           Next, Steven Pruett comes to us from Los Angeles  
23 Department of Water and Power, where he's been with the  
24 department for 33 years and is currently the manager of  
25 Settlements and Wholesale Energy Resources.

1           Next, John Olson is the director of Energy  
2 Trading and Contracts at Sacramento Municipal Utility  
3 District, where he leads the management of SMUDS Long,  
4 Medium and Short-term Resource Portfolio. John's team is  
5 responsible for execution in bilateral markets as well as  
6 in the California ISO's Energy Imbalance Market.

7           And then lastly, we've got some perspective from  
8 Tim Vigil, who comes to us as the senior vice president of  
9 the Colorado River Storage Project Manager. Tim leads all  
10 the Power Marketing and Operation activities for the  
11 Colorado River Storage Project Managing -- Management  
12 Center in Salt Lake City, Utah, and also manages the Energy  
13 Management and Marketing Office at Montrose in Colorado.  
14 The CRSP Management Center has 38 employees, manages sale,  
15 purchase of willing and interchange, transmission of energy  
16 for about 150 retail customers and other utilities in  
17 Arizona, Colorado, Nevada, New Mexico, Texas, Utah and  
18 Wyoming. And Tim has perspective because the Colorado  
19 River storage, he has some perspective about the  
20 availability, especially under the drought conditions of  
21 energy coming from things like Glen Canyon and the Colorado  
22 River System. So we look forward to his perspective as  
23 well in this discussion. So with that, I am going to turn  
24 it over first to Marci.

25           MS. PALMSTROM: Hi. Good afternoon everyone.



1 Thanks. Thanks, Mark. Happy to be here. As Mark  
2 mentioned, in parts are really a critically necessary part  
3 of the mix. I mean, they play a major role daily in  
4 meeting our RA Requirements, but they also have an  
5 important, you know, non-RA component. They do provide  
6 just energy when we need it the most. In the heat waves we  
7 saw last year, we were we were in the market looking to get  
8 imports really day over day. So definitely there's concern  
9 about the future. You know, we are also seeing the same  
10 lower net import levels in 2021 compared to previous years.  
11 And again, as Mark mentioned, significant lower on higher  
12 demand days.

13 Outages are also increasing. Another trend that  
14 we're looking at and, you know, looking at the CAISO  
15 outage -- CAISO-wide outages. Just in June alone, we saw  
16 outages, you know, 35 to 45% higher than in previous years.  
17 So this is all happening at a time when reliability is our,  
18 you know, our biggest concern and our priority.

19 So a couple of perspectives that I have going  
20 forward is, you know, when we start looking at import,  
21 let's make sure that we're the policy and regulatory  
22 efforts are targeting the right areas. And by that is, how  
23 can we just think more broadly? Because really the crux of  
24 this, the focus is who has the supply? Where is the  
25 supply, and how can we get it to California and how can we

1 get it to stay in California? I'll give you a little bit  
2 of perspective on our efforts in the daily market, you  
3 know, getting RA deals, you know, done for Q3 of this year  
4 has been very challenging. The markets lack liquidity, and  
5 supply is really tight for imports.

6           Everybody's fighting, you know, for the  
7 same -- for the same thing. And when you continue to see  
8 these heat waves where it's not only Southern California  
9 and Northern California, it's west wide, everybody's  
10 fighting for the same megawatts. So there's just been  
11 a -- it's been a tough journey there, and you know, there  
12 are -- there are current requirements that have been put in  
13 place in order to make sure that imports are coming to  
14 California, you know, and you know, even with that  
15 additional layers put on, you know it doesn't necessarily  
16 stop marketers from trying to export power when they're  
17 seeing \$1,400 prices.

18           So you know, I think one of the areas is we've  
19 got to really be careful and thoughtful about how we layer  
20 on incremental requirements when we don't yet understand  
21 what the impacts are to serve reliability. In terms of  
22 characteristics like what we see in the market, it's  
23 essentially, what is the cost and who has the supply. So  
24 like I said, is everyone's competing for the same thing,  
25 and as California moves, you know, more and more toward

17

1 decarbonization and, you know, cleaner energy future. I  
2 mean, this just becomes a, you know, really a bigger grab.

3           So what are some of the things that we could  
4 think about going forward? I think that there is a real  
5 opportunity for more information and coordination across  
6 WECC. Are there products that could be available on a  
7 daily or intramonthly basis? And could there be market  
8 design and market expansion that could facilitate transfers  
9 among balance authorities if they decide in that hour or  
10 that day that that is not needed, but could be useful in  
11 another area, and how can we facilitate those, I guess,  
12 more quickly and more often, and just getting access to  
13 additional supply. So more coordination and communication  
14 could be driven within the current and even future energy  
15 and balance market participants.

16           In other areas, you know how -- is there -- is  
17 there a way for us to get more visibility outside of  
18 California on the available capacity? So again, as the  
19 fleet decarbonizes and we see retirements, you know, how  
20 can we, you know, see what supply is on the horizon and  
21 what's out there and just have visibility to what's  
22 available in the market?

23           So I would -- I would caution before, again,  
24 layering on additional requirements, you know, into  
25 bringing imports in. You know, let's try to get through

1 the summer. It's going to be -- it's already  
2 proven -- showing, Summer's already showing us it's going  
3 to be tough. I think it's really important that we do an  
4 After the Fact Analysis on this summer and, you know, how  
5 imports have fared. I mean, I think that's a given. I  
6 believe that that's, you know, that it, that is on the work  
7 -- in the works. But I think it's really important that we  
8 look at how have the current requirements for imports  
9 fared, how are they helping with reliability? Are they  
10 really contributing to bringing more imports into the  
11 state, you know, and is the current construct we have  
12 really meaningful?

13           And so I think working with the market just to  
14 make sure that as we do make changes, we're involving the  
15 market so that it's a robust process and, you know, we have  
16 all the right people having the conversation and willing to  
17 make the changes at the same time.

18           So I'll stop there. Thank you, that's all I  
19 have.

20           MR. ROTHLEDER: Thank you, Marci. Now, if we can  
21 go to Scott.

22           MR. RANZAL: Well, good afternoon. Thank you for  
23 the opportunity to speak today. As Mark mentioned, my name  
24 is Scott Ranzal, and I'm the director of Portfolio Management  
25 in Energy Policy and Procurement at Pacific Gas Electric

19

1 Company. In my current role I oversee the Management  
2 Wholesale Power Portfolio, including the Energy Capacity and  
3 Associated Environmental Products with that. PG&E is the  
4 company who's been working to deliver safe, reliable,  
5 affordable, and clean energy to California for over 100 years  
6 and to serve our customers while doing so. PG&E's 23,000  
7 employees deliver resilient power and natural gas service to  
8 more than 16 million Californians and a resource portfolio  
9 that is more than 80% greenhouse gas free.

10 On to the Imports. The western U.S. has long relied  
11 on each other to share capacity and energy to meet the overall  
12 needs in the western half of the U.S. And until recently,  
13 this was fairly easy due to the diversity of demand needs,  
14 peaking area needs, as well as supply availability that was  
15 in excess of what the immediate needs were. And while the  
16 impacts at climate change, shifting generation resources from  
17 fossil to use limited renewable resources and storage option,  
18 as well as changing customer use patterns, may be felt more  
19 in California, these shifts and their impact will disrupt  
20 operations throughout the west for the coming decades.

21 This is having a very acute impact on the  
22 availability and cost of imports, as people in California,  
23 as people have already mentioned. As the retirement of  
24 fossil resources in California across the west continue,  
25 the availability of on demand resources often used to

1 deliver to neighboring areas with different peaks, is less  
2 prominent. Recent rule changes to the PUC and the ISO are  
3 impacting market supply and demand and changing what is a  
4 tightening Resource Adequacy Import Requirements and  
5 ensuring energy is delivered as well. It's become more  
6 difficult, and the electric system is really adjusting to  
7 the new normal.

8           PG&E has historically utilized capacity imports,  
9 for various reasons, with changes in the portfolio, Import  
10 Rules, Resource Adequacy, and energy needs, are compelling  
11 PG&E to continue to evolve and develop strategies regarding  
12 the use of imports to address its needs and serve its  
13 customer. PG&E, like many others, is adapting, and recent  
14 price surges in the market are a good indication of the  
15 market's reaction to many of these dynamics.

16           For California and the west, they continue to  
17 work to address decarbonization goals while maintaining a  
18 reliable energy infrastructure. We will all need to  
19 embrace the opportunity to rethink the future before us and  
20 react swiftly to the changing environment. The existing  
21 FERC Open Access Tariff Service paradigm throughout much of  
22 the west, and the ISO's transmission rate structure will  
23 also need to adapt to ensure that reliability is afforded  
24 to all at adjusted reasonable price. Efforts towards  
25 regional planning and coordination, balancing authority

1 agreements for normal and emergency operations, and clear  
2 and transparent rules and regulations are critical steps  
3 that should begin as soon as possible.

4 With that, I will thank you for the opportunity  
5 to talk and look forward to hearing from the other  
6 panelists.

7 MR. ROTHLEDER: Thank you, Scott. Appreciate  
8 those comments. Steven Pruet here. You're next up.  
9 Thank you.

10 MR. PRUETT: All right. Thank you. Can you hear  
11 me?

12 MR. ROTHLEDER: Yes.

13 MR. PRUETT: Great. Again, also, thanks for the  
14 opportunity to be here. I appreciate it. This is a lot of  
15 very interesting and very important stuff. L.A., like many  
16 others in California, is working diligently on meeting our  
17 renewable goals. And like pretty much everyone else, we  
18 are ending up with a lot of solar, some wind, and as much  
19 geothermal as we can round up. You know, those have very  
20 different characteristics. And two of those three, solar  
21 and wind, are variable. So at the same time, L.A. has  
22 found it increasingly challenging to maintain its  
23 traditionally reserved Supply Planning. L.A. plans with a  
24 lot of reserves in available and a stand-back, and let some  
25 things idle approach, especially on the more burdened days.

22

1           We plan, for example, against seasonal all-time  
2 peaks, average peaks, and then we divvied that up amongst  
3 months or quarters, depending on the trends and analysis  
4 we'd done. And we and particularly during the tighter  
5 periods, we make sure we have full reserves not just in  
6 operating or flex types, but also replacements, because as  
7 a lot of us know, when things can go wrong, they often do,  
8 and it's sometimes at the worst time.

9           So some of the ways we pursue our renewable and  
10 clean energy goals, while maintaining that level of  
11 redundancy, is when we go out for a power purchase  
12 agreement, which is the way we're doing the majority of  
13 our -- of our procurements right now, we always seek to own  
14 and operate. But the scale of it makes it difficult. But  
15 those contracts are mostly imported at intertie We make  
16 sure that there is firm clear transmission for bringing  
17 that energy into our load centers. And those contracts are  
18 tightly written so that there is a clear commitment to  
19 produce that energy according to a predetermined schedule  
20 and expectation.

21           Similarly, when we go to the various markets out  
22 there at our intertie, we always and usually are able to  
23 secure that import on firm transmission. We also ask that  
24 our suppliers bring it in on firm transmission, but  
25 sometimes we can't get that, so we settle for non-firm.



1 But again, we transact product that pretty much guarantee  
2 with relatively stiff penalties that this, we can rely on.  
3 We can rely on this energy coming in, and we can count on  
4 it.

5 As far as the evening ramp down, which is largely  
6 a lot of us, our new challenge point in, particularly in  
7 the summer months, L.A. generally doesn't import during the  
8 evening ramp down. We have found, through our analytics,  
9 that if we start to ramp up some of our combined cycle  
10 sleep a couple hours before, say 5:00 p.m., that really  
11 fits in very neatly to a lot of weather situations and  
12 weather conditions that allows us to enter the later night  
13 loads where we can then bring some of those combined cycles  
14 off or leave them in a lower multi-stage state. So that  
15 seems to work pretty well for now, however, as you know,  
16 the percentages of solar and wind and whatever else comes  
17 down the road increases, that ramp down is going to become  
18 more difficult and more perilous to deal with.

19 So L.A. has a few tools in its box that currently  
20 we're staying ahead of the amount of solar that we have,  
21 relative to our load and in those evening hours. We have a  
22 small fleet of simple cycle 100 megawatt fast start  
23 turbines we can use if the combined cycles are not doing it  
24 fast enough or if the solar, say drops off quickly. We  
25 also have our hydro storage facility, Castaic, which is

1 incredibly handy and useful and still has room to grow and  
2 be used. We also recently joined the CAISO's Energy  
3 Imbalance Market, which has been a really neat experience  
4 for us. It pretty much allows us the real time  
5 optimization of L.A.'s assets, while accessing real time  
6 economic opportunities across a really big footprint. So  
7 it's definitely very advanced and very interesting to us  
8 and we are really enjoying ourselves with that.

9           So as L.A. moves forward, you know, we're going  
10 to -- one of the stalwarts of our plan is to make sure that  
11 we're going to continue to plan with a very wide margin, I  
12 guess you can say, particularly on the tighter times. And  
13 it's not just, say, summer. In the springtime now, we're  
14 seeing the solar ramp up can be difficult to deal with.  
15 Our, I guess our customers like to sleep in. I do, too.  
16 But they don't get using electricity as early as the solar  
17 wakes up. So we have found that we have to deal with that,  
18 and again, we're fortunate to have a pump storage facility  
19 that allows us to take advantage of that. We also now have  
20 the EIM, which can make that energy available.

21           So I think going forward, as we all bring in more  
22 renewable energy, variable energy, as a share of our total  
23 portfolio, and as a share of our total load, you know L.A.  
24 is going to continue to be conservative in its approach and  
25 continue to leverage its abilities to bring projects online

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1 that meet all those requirements, but also a  
2 regionalization and a look at joint opportunities, shared  
3 projects, like I heard earlier, that you know, pump storage  
4 is very expensive and very big with a long payback time,  
5 but maybe with enough participation, these things can  
6 become more feasible. So that's kind of L.A.'s posture  
7 going forward is kind of hold the line. But we are also  
8 excited to be able to currently meet our renewable goals  
9 and we're hoping to continue to do so. Thank you.

10 MR. ROTHLEDER: Thank you, Steven. Next up, Mr.  
11 Olson, you have the floor.

12 MR. OLSON: Thanks, Mark. And good afternoon,  
13 everybody. Thank you for the opportunity to participate in  
14 the panel today. My name is John Olson and I'm the  
15 director of Energy Trading and Contracts for SMUD Agency,  
16 consisting of SMUD, Modesto Irrigation District, Roseville,  
17 Redding Electric Utility, Trinity Public Utility District,  
18 and the City of Shasta Lake. This is just a check. There  
19 you go. I'm having some audio problems for some reason.  
20 It's going in and out.

21 MS. RAITT: You might want to off -- maybe turn  
22 off your video. Would that help with the bandwidth?

23 MR. OLSON: I'll try that. I'll try that.  
24 That's fine.

25 MS. RAITT: Right, Kelly, you could - you could

1 bring up the slides, please. It's worth a try anyway.

2 MR. OLSON: Okay. Sorry about that. I'll  
3 continue.

4 Essentially, SMUD is a member of BANC, Balancing  
5 Authority of Northern California, so we're outside the  
6 CAISO footprint, but we do participate in the EIM market  
7 and SMUD joined back in spring of 2019. BANC is the third  
8 largest BA in California. SMUD is dependent on imports for  
9 both to our BA, for both RA compliance, as well as the  
10 ultimately serving SMUD load. In addition to imports from  
11 CAISO, contracted resources -- in addition to CAISO  
12 contracted resources, we contract resources in the  
13 northwest and the southwest, which all need to ultimately  
14 end up coming home to SMUD from the various BAs. Example  
15 of contracted resources include traditional thermal plants,  
16 utility scale renewable projects, and small renewable  
17 projects.

18 Contracting for RA, simply put, has been very  
19 difficult in the current market. Market prices have --  
20 Sorry, I'm not sure what's going on with the audio, but,  
21 the contracting has been very difficult, market prices have  
22 more than tripled for the calendar year products as  
23 compared to recently as 2015 and 2016 prices. Prices for  
24 seasonal commitments such as summer alone, are four to five  
25 times what we saw in 2015 and 16. Individual months, such

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1 as July, or August, or September on their own, have  
2 completely blown out in our trading at six and seven times  
3 the equivalent of 2015 and 2016 pricing.

4 Scarcity of RA presents some additional issues  
5 than just price, however. Higher quality units, higher  
6 quality counter parties are aggressively pursued. In these  
7 times when we need every last megawatt, there's a higher  
8 likelihood that the remaining units and counter parties may  
9 come with less than desirable operational and business  
10 terms. This can become a contracting problem. Mark  
11 mentioned the shaping of imports. EIM is a perfect tool  
12 for shaping the op -- in the operational window. But from  
13 a Planning and RA perspective, we have not had much luck in  
14 the way of finding willing partners to shape products.  
15 This includes for entities inside the CAISO footprint, as  
16 well as at trading hubs such as California, Oregon,  
17 COBtrading hub.

18 As stated earlier, SMUD has been a member of the  
19 CAISO Energy Imbalance Market and it serves as SMUD's  
20 primary real time market. RA is largely a planning  
21 construct. EIM participation is largely an operational  
22 construct. For EIM participants, if you can show you are  
23 fully resourced for coming -- for the coming hour, for both  
24 energy and flexibility, the CAISO will optimally redispatch  
25 resources across the entire EIM footprint. That footprint

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1 stretches from British Columbia to California, desert  
2 southwest to Wyoming and Montana. EIM is a rich regional  
3 diversity -- rich in regional diversity. Hydro in the  
4 northwest, solar in the desert southwest, wind in the basin  
5 area. California is a large geographic diversity area  
6 within itself, and regions within California have different  
7 wind, solar and geothermal capabilities.

8           In addition to this fuel diversity in the west,  
9 there is time zone and weather diversity. I think we all  
10 have learned a few lessons about weather diversity, given  
11 the events of last August and what Mark talked about  
12 earlier, about what we saw when we have a very large,  
13 uniform, hot, west from the, you know, from Canada down to  
14 the desert southwest. But there is typically weather  
15 diversity available. EIM has been a valuable market for  
16 the SMUD ratepayers, and in my opinion, much of the success  
17 of the EIM market is driven from the west wide regional  
18 diversities that I've alluded to.

19           In the relatively recent past, planning for that  
20 operational window, such as day ahead or real time, largely  
21 consisted of stacking energy resources in an optimal  
22 mirrored order. However, today's planning for that  
23 operation window is much more complex. For example,  
24 ramping requirements and managing the net peak have become  
25 equal aspects to consider in both day ahead and real time

1 timeframes as just energy alone. You saw evidence of this  
2 in Mark's earlier slides. What plant can catch a ramp?  
3 How can we, inside our -- with our -- inside our own  
4 entities manage the net peak, including distribution energy  
5 resources? As an LSE and as good as EIM has been, you  
6 cannot leave these details to that operational hour. This  
7 brings us back to the Planning and RA conversation.

8 All portfolios need energy, mapping flexibility,  
9 responsiveness. The more narrow you look at a footprint,  
10 the less diverse the utility, or the less diversity there  
11 is to utilize. The broader the footprint, the more  
12 diversity to utilize for everyone's benefit. I don't care  
13 what individual footprint you want to use as an example, it  
14 will not have the overall diversity as the entire WECC  
15 wide, or EIM footprint. It would be my opinion that any  
16 well-balanced portfolio for any LSE needs to be able to  
17 utilize regional diversity, which includes the ability to  
18 be able to use imports and exports.

19 We as an industry are undoubtedly in a period of  
20 transition to a decarbonized grid. Some states and  
21 organizational goals, organization's goals, differ on  
22 timing and maybe the aggressiveness of the timing, but the  
23 movement is absolute in nature. It's exciting time to be  
24 in the end, be involved in this transition. DERS,  
25 Distribution Energy Resources, and Bulk Energy System

1 Solutions are both needed aspects of any modern energy  
2 portfolio.

3           To specifically address Mark's question on how  
4 California can engage the California with the -- with the  
5 CAISO, or how California can engage with the CAISO, BA, the  
6 state, and the interconnect. I offer a couple simple  
7 thoughts. First, from the CAISO standpoint, continue doing  
8 what you're doing from a stakeholder perspective. The  
9 outreach that you did in an August 2020 heat event was much  
10 appreciated. While difficult decisions and conversations  
11 were had and needed to be made, I think all entities  
12 appreciated the outreach. Also, additional transparency of  
13 business practices, especially when, as applied to imports  
14 and exports, would be appreciated.

15           At a higher level from the state and interconnect  
16 level, I bunched them together because, I know there's a  
17 distinct difference, however, I think the need, each need,  
18 is very similar. Long-term Regional Planning for both  
19 Transmission and Resources would offer the highest level of  
20 benefit with the lowest level of cost for the broadest  
21 footprint. A regional day-ahead Market would also allow  
22 for the -- a more optimal use of region diversity in the  
23 operational window.

24           And that concludes my comments. Thank you, very  
25 much.



1           MR. ROTHLEDER: Thank you, John. I appreciate  
2 those comments. Next up, we've got Timothy Vigil. Thank  
3 you, Tim.

4           MR. VIGIL: Thank you for the invite. Glad to be  
5 here. And you know, I guess I have a slightly different  
6 perspective because I'm kind of outside of the state and  
7 basically trying to help with WAPA assets when times are  
8 lean when these hot days occur in the summer. So WAPA is  
9 committed to using their generation assets during energy  
10 emergencies in any way we can. As you know, we've been in  
11 drought conditions across the west, so we don't typically  
12 have surplus water, but we can run water now and buy energy  
13 later to cover our firm commitments to our customers, as  
14 long as we, you know, can make the financial -- the  
15 financials work to keep us from going upside down, we do  
16 anything we can to make sure that we do that, especially  
17 for reliability, and when we get to the point where the  
18 system is starting to have impacts and rolling blackouts  
19 are imminent.

20           You know, I'm going to primarily talk about Glen  
21 Canyon emergency assistance to California. Our other  
22 regions contribute to that too, of course. You're all  
23 probably familiar with the Sierra Nevada Region and Folsom  
24 and they're half in the CAISO, half out. But in the EIM  
25 also, so they interact with the markets during these, you

1 know, critical times in the summer on day-ahead and real  
2 time. The rest of WAPA outside of California usually  
3 interacts in the real-time markets when things are under  
4 emergency conditions, excuse me, conditions. So Sierra  
5 Nevada provides assistance in that way through those  
6 markets.

7           Our Desert Southwest region, which controls  
8 Hoover Dam and the Parker Davis project, they typically  
9 don't have the resources to participate when we have  
10 emergencies, but there are times such as last year when  
11 they can turn off pumps and free up some energy. And so  
12 they were able to do that somewhat last year. But Glen  
13 Canyon in the Colorado River Storage Project region of WAPA  
14 is -- has a long historical relationship with California,  
15 particularly the California ISO and the California entity  
16 that existed back in 2000, and that's kind of where it  
17 started.

18           The first time Glen Canyon was ramped  
19 up -- ramped up to provide emergency energy was back in the  
20 2000 crisis. And since then, we've been making a lot of  
21 preparations to do that. And in 2016, we made a very  
22 strong effort. You know, I think at the time there was the  
23 gas storage facility that was making people nervous in the  
24 west, and we decided that we were going to make sure that  
25 we could make this happen in real-time because it does get

1 complicated. So we worked with the ISO, we worked with the  
2 Reliability coordinator at the time, with the BAs, to set  
3 up a system where Glen Canyon could ramp up and provide  
4 energy to California during those really bad times. And  
5 you know, we're -- we can't just generate out of Glen  
6 Canyon without being under these conditions. We have -- we  
7 run within a narrow bandwidth on Glen Canyon because it's  
8 emptying or releasing into the Grand Canyon. So there are  
9 lots of environmental restrictions, Record of Decision, and  
10 we have to follow that, unless there's an emergency and  
11 it's a true bona fide emergency.

12           So this only happens on the fly when these  
13 conditions are met. But, you know, there are several  
14 conditions, all non-firm energy sales have been terminated  
15 in the CAISO, interruptible loads have been interrupted.  
16 Things of that nature. We have a list of conditions that  
17 have to be met, and when they are met, then we'll ramp up  
18 Glen Canyon. And we have, you know, a contract with the  
19 Bureau of Reclamation to make all this happen and go  
20 outside those environmental limits during these  
21 emergencies.

22           And so there's a lot of coordination, like I  
23 said. You know, these days there's two Reliability  
24 coordinators. There are several BAs. We have to buy  
25 transmission to get across a couple of these different

1 transmission systems and get the energy into the CAISO  
2 market. And typically at the LMP prices, how we've done  
3 it. Now, we would provide energy, emergency energy to any  
4 BA in the west, and it's on a first come, first serve  
5 basis, so we, you know, it's open to all, but whoever  
6 calls on it first, obviously, is going to get that.

7           You know, and to talk a little bit about some of  
8 these questions. You know, we don't always have energy.  
9 You know, it's kind of on, if the CAISO calls us and asks  
10 for emergency energy, we have to look and see, you know,  
11 what kind of capacity we have available. As you know,  
12 we're in a drought. We've had loss of capacity from the  
13 elevation going down, loss of head on the lake. And so  
14 pretty much whatever we have will do, but you know, we  
15 can't ever guarantee that we'd have a certain amount. It  
16 all depends on the hour and the day. We don't really have  
17 any ability to shape anything. Again, it's what we have at  
18 the time.

19           You know, for the future outlook, you know, it's  
20 probably, it doesn't look like it's getting better for  
21 availability of our generation. All the data that we're  
22 looking at for water flows are getting worse. So, you  
23 know, we -- we'll do what we can while we have the water,  
24 and we do have to buy it back. You know, we buy energy for  
25 our customers when we use that water because it's a limited

1 fuel supply for us.

2 And as far as the regional  
3 coordinate -- coordination, we've managed to make it work.  
4 It's fairly cumbersome. You know, it would be easier if we  
5 were all, you know, in one market or in two markets that,  
6 you know, 4 RTOs that were, that had good SEAMs, 21  
7 agreements across those boundaries. But I think -- I think  
8 that might make it -- make it easier in the long run.

9 And you know, I guess we're at the end here, so  
10 if we go to a question and answer session, I'd be glad to  
11 answer any questions anyone has.

12 MR. ROTHLEDER: Well, thank you, Tim, and thank  
13 you for -- to all the panelists. At this point, I think  
14 I'll turn it back to Heather or Commissioner Gunda.

15 COMMISSIONER GUNDA: Yeah. Thank you.

16 MS. RAITT: Commissioner, Go ahead.

17 COMMISSIONER GUNDA: Yeah. Thank you, Heather  
18 and just who all, that's really kind of important  
19 information. Thank you for sharing kind of your various  
20 perspectives. And Mark, thanks for setting up the  
21 presentation at the top. I think it was very informative  
22 to kind of set the context for this conversation. I'm sure  
23 the Commissioners will have a lot of questions here. I  
24 just want to kick it off by kind of a couple of questions  
25 that are connected to any of the members that might want to

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1 take this on. So I think, one, is this transitional,  
2 right? This kind of trends that we are watching in terms  
3 of imports. I mean, the whole west is kind of moving  
4 towards a decarbonized future and hence there is  
5 retirements and such happening, but also the  
6 electrification goals are going on. You know, the trends  
7 towards imports right now, are we -- are we going to  
8 continue to trend downward as we move forward. How do we  
9 think about that? So I just want to get your high-level  
10 context, high level thinking on how should we think about  
11 imports moving forward, especially in Resource Planning?

12 MR. ROTHLEDER: Well, this is Mark, and I'll  
13 weigh in first and then I'll let others chime in. But I  
14 think our, I think there will be still a trend of  
15 broadening range of import patterns. There will be times  
16 where we will be a net exporter. But I think for those  
17 hottest days, highest load periods, while the supply and  
18 demand changes are transitional, we are going to still  
19 remain reliant on a fair amount of imports. I think the  
20 challenge is, is the availability of that supply feeding  
21 those imports is uncertain now, and that's as a result of  
22 the broader transformational changes that going on across  
23 the west. And that's why I feel, at least a level of  
24 coordination that if that doesn't take place today, in  
25 terms of supply, transmission, and coordination, is really

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1 necessary to ensure that we're correctly making assumptions  
2 about the availability of that supply and transmission  
3 going forward. Because I worry that without that  
4 coordination, and if assumptions are wrong, it has real  
5 consequences in being able to meet the demand.

6 COMMISSIONER GUNDA: Thank you, Mark. Any other  
7 panelists might want to comment on this? Okay. I don't  
8 see any. Just some questions from the dais.

9 PRESIDENT MAINZER: Commissioner Gunda, this is  
10 Elliot.

11 COMMISSIONER GUNDA: Go ahead.

12 PRESIDENT MAINZER: Yeah. I do have a question.  
13 Yeah. So really, really interesting panel. Really  
14 appreciate all the different perspectives. I was, a number  
15 of you spoke about the importance of diversity, kind of  
16 wide area diversity, across the western United States, the  
17 value of the EIM has been producing. There's a lot of talk  
18 about Resource Adequacy on the generation supply side.  
19 Where does Intraregional Transmission Infrastructure play  
20 into your visions as well, in terms of accessing new supply  
21 resources, diversification, strengthening the value of the  
22 Energy Imbalance Market, and potentially day-ahead  
23 environment?

24 How are you -- and can any of you guys offer any  
25 thinking about how you -- how you're thinking about those

1 issues, and specifically how those relate to California's  
2 resource future?

3 MR. OLSON: Elliot, I'll take a crack at part of  
4 that. I think that originally, whenever you talked about  
5 Regional Planning, it typically had this transmission type  
6 of focus to it. And while that's obviously an important  
7 component of Regional Planning, I think the addition of  
8 having Resource Planning, Supply Planning to go along with  
9 the transmission side is important. And it's quite simply  
10 put, you know, we as a western community or western  
11 footprint, should build wind resources where wind blows.  
12 We should then build the solar resources where sun shines.  
13 And I think that the transmission and the resource part of  
14 that have to go together.

15 So in those conversations, I like one of the  
16 comments I heard earlier when we started talking about pump  
17 storage and the high capital cost of a barrier to being  
18 able to start looking at those kinds of resources. But if  
19 we come together and plan for the resource side and pool  
20 resources, and when I say resource I'm talking dollar  
21 resources and needs, now all of a sudden that might become  
22 feasible. So I think Regional Planning has to be not only  
23 transmission, but also resources.

24 PRESIDENT MAINZER: Yeah. Thank you for that,  
25 Jon. I'm interested, any of the other panelists like to



1 take a shot at that? Love to hear some diversity in  
2 perspectives.

3 MR. RANZAL: Elliot, this is Scott from Pacific  
4 Gas and Electric. I would agree with what Jon said. I  
5 think with coordination of the entire Planning Process,  
6 both Transmission and Generation, at least at a minimum  
7 transparency and visibility to what is happening in the  
8 different sectors of the west is important so that, to  
9 Mark's point, we can have a clear understanding of, you  
10 know, where those resources are, how they are made  
11 available to others in times, whether they be normal  
12 operating conditions that exist inside of EIM, which has,  
13 you know, produced a lot of benefit and robustness for the  
14 market.

15 Or, in an emergency condition, you know, as a  
16 couple of the other panelists have talked about, where it  
17 certainly becomes more critical to have from an operational  
18 standpoint, a really good understanding of what the  
19 capabilities are, how people can utilize the existing  
20 resources and transmission to serve the entirety of what's  
21 necessary is really important. And I think the Planning  
22 Process can do a job in looking at that.

23 And then there's the operational things that also  
24 need to be put in place to ensure that it carries clearly  
25 from the Planning Process into day-to-day operational

1 activities without a disconnect or a misunderstanding that  
2 happens when it's most critical, which is one of those  
3 real-time operational events.

4 PRESIDENT MAINZER: Yeah. Thank you.

5 MS. PALMSTROM: Yeah. This is Marci. I'll just  
6 add onto that. I mean, I think in an ideal state, yeah,  
7 for sure, you would want those, you know, in parallel, that  
8 that type of planning. I think, you know, my concern is  
9 just how do we how do we manage costs for things like that  
10 to our customers? I mean, all those costs that are then  
11 passed down to customers. So how do we manage those costs  
12 and just make sure we're still making it affordable for  
13 customers across the board?

14 And I think just recognizing that, you know, and  
15 I'll say a majority of the, you know, vast majority of the  
16 RA that we're bringing in is on firm transmission. There  
17 is generation that can get into the state on non-firm  
18 transmission, and it does happen. And so I, recognizing  
19 that non-firm is still an important part of bringing  
20 resources into the state, right. So not, you know, I don't  
21 know that we can have a world where everything is firm.  
22 You know, how do we -- how do we make sure that there's  
23 enough there to bring everything we can in? And again,  
24 like everyone was saying, really plan for it. If we're  
25 building the resources, we have the right transmission to

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1 bring it in.

2 PRESIDENT MAINZER: Yeah. Great perspectives.

3 And I know we want to move to some other questions.

4 Commissioner Gunda, I'll just say that I really look  
5 forward to really continuing to deepen the dialogue with  
6 the Energy Commission and the PUC and stakeholders and, you  
7 know, and the other load serving energies in California.  
8 These concepts of aggregation, the understandings of the  
9 changing supply resources, diversification, increasing  
10 transfer value, economic optimization, environmental  
11 optimization. I think these are just becoming increasingly  
12 pressing variables for the state, and all the work that you  
13 guys are doing in the background on permitting and siting  
14 and then, you know, deliverability, access. I just want  
15 to, I'd appreciate creating some space for that, increasing  
16 the amount of space for that conversation. So thank you,  
17 guys. Again, I'll stop. Let the next Commissioner go,  
18 please. Thank you.

19 COMMISSIONER GUNDA: Yeah. Elliot, thank you for  
20 kind of saying that. I mean, I couldn't have said that  
21 better. And I think this just prompts both this morning  
22 conversation and this afternoon. I think we're just  
23 beginning to it. And it could be multi day conversations.  
24 And then kind of, I think we really need to dig into these  
25 conversations, you know, maybe, you know, do roundtables or

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1 whatever to think through how best we can develop, you  
2 know, assumptions as we -- as we plan for the future. And  
3 I think an important point that came up today is really the  
4 importance of the rest, but coordination. So really  
5 thankful for, you know, the panelists for making those  
6 points. But I'll go to Commissioner Douglas.

7           COMMISSIONER DOUGLAS: Yeah. Thank you,  
8 Commissioner Gunda. You know, just really a quick follow  
9 up question from the last couple comments. When you talk  
10 about improving Planning and the visibility of both  
11 Transmission and Resources, of course, we're making an  
12 effort to do that here as, between the Energy Commission,  
13 and the CPUC, and the ISO, and stakeholders, and you know,  
14 particularly around our SB100 goals, but I wanted to ask in  
15 what way you see the need to incorporate kind of the  
16 broader west wide perspectives and what are the ways that  
17 exist of doing so? Or are there any specific steps that  
18 you recommend that would really enhance that kind of  
19 effort?

20           MR. ROTHLEDER: Maybe I'll take a cut at it and  
21 then I'll let others weigh in. I do think there  
22 need -- there is a role for WECC in this. Unfortunately,  
23 WECC doesn't really drive the Planning out of it, but I  
24 think convening and gathering information that is then  
25 shareable and I think, like Scott said, transparent to

1 everybody, that we're using a common set of data and  
2 information that is robust and useful is important. And  
3 maybe at a -- at a regional level, is there -- is there  
4 regional resource efficiency and if not alerting and maybe  
5 driving the different parts of the region to what is, our  
6 solutions are necessary, a solutions to that.

7 COMMISSIONER DOUGLAS: Mm-hmm.

8 MR. ROTHLEDER: I think we can -- I think if they  
9 have a concerted convening power to bring different states,  
10 different parts of the region together, and I think that  
11 would be at least one aspect of it, in addition to our own  
12 coordination and outreach with each other and continued  
13 collaboration on these matters.

14 COMMISSIONER DOUGLAS: Yeah.

15 COMMISSIONER MCALLISTER: Can I maybe. Oh,  
16 sorry. I'll wait.

17 COMMISSIONER GUNDA: I just -- no, Commissioner,  
18 I just wanted to check if anybody else wanted to comment  
19 and then kind of pass it down to the --

20 COMMISSIONER MCALLISTER: Just sort of jumping  
21 into that breach. I guess I wanted to maybe, so that,  
22 Commissioner Douglas kind of asked much of the question  
23 that I -- that I was going to tee up. But, you know, we do  
24 have some regional advisory kind of institutions already.  
25 Right? We've got the Western Interstate Energy Board and

1 we've got the WIRAB, the Western Interconnection Regional  
2 Advisory Body. So we do have these kind of WECC wide  
3 entities that could sponsor a west wide or, you know, sort  
4 of provide a platform, at least with member resources for  
5 having some of this discussion. I guess I'm wondering, you  
6 know to Commissioner Douglas's question, are there, one are  
7 needs for sort of that convening kind of beyond California  
8 out there to try to get a handle on this? And would those  
9 be potential platforms, say to WIRAB or something, you  
10 know, sponsoring a research project or something like that?  
11 Would that be, you know, helpful?

12 MR. ROTHLEDER: In my opinion, I think it would  
13 be, and I think we also have to be aware that there are  
14 organizations forming, collaborations forming, north of  
15 power pool resource adequacy efforts. So there's new  
16 bodies and structures that are starting to look at broader  
17 regional Resource Adequacy, bring them into a discussion,  
18 whether it be under WIRAB or whatever I think would be  
19 really productive.

20 COMMISSIONER MCALLISTER: Great.

21 MS. PALMSTROM: Yeah. I just agree with that. I  
22 mean, and you know, I think certainly the load serving  
23 entities having visibility to those planning efforts and  
24 those discussions. So it's certainly one thing for the  
25 Balancing Authorities to be able to coordinate and

1 communicate, you know, on the demand and the need and the  
2 supply. But to the extent you have, you know, large, you  
3 know, Ls like Edison, and PG&E, and others, you know, that  
4 have big loads to serve and big supplies to gain in order  
5 to meet that load, it would be helpful to know, like what  
6 could our role be in that communication? Like what could  
7 our, you know, how could we participate to have that  
8 visibility, to be able to contribute early on in the  
9 process, you know, as opposed to trying to kind of play  
10 catch up? I guess.

11 MR. ROTHLEDER: Mm-hmm.

12 MR. MCALLISTER: Great point. That's a great  
13 point. So a formal process with more involvement early on,  
14 from various stakeholders.

15 MS. PALMSTROM: Yeah, in fact --

16 COMMISSIONER GUNDA: Commissioner, thanks. Yeah.  
17 Sorry, Marci. Please, please finish your thought.

18 MS. PALMSTROM: No, that's OK. I was just going  
19 to say, I think that, you know, the earlier on we can get  
20 involved and the market involved, I mean, you get everybody  
21 then at the process at the forefront, and so we're all kind  
22 of working toward the same solution. I think the market  
23 transitions more quickly that way.

24 COMMISSIONER GUNDA: So yeah. I just want to go  
25 back to Commissioner McAllister and Commissioner Douglas,

1 if you have any follow up questions. If not I'll go to  
2 Commissioner Rechtschaffen and then Guzman Aceves.

3 UNKNOWN SPEAKER: [Background voices].

4 Yeah, I think somebody's voice is cutting in, so  
5 I'll go to Commissioner Rechtschaffen.

6 COMMISSIONER RECHTSCHAFFEN: Somebody doesn't  
7 want me to talk Commissioner Gunda because you put on the  
8 noise so that nobody could hear me. I know that you.

9 I have -- I have two relatively straightforward  
10 questions. One, the first is from Marci. And I think I  
11 heard you say at the start that you're seeing a lot more  
12 outages this year than before, 5%. So I hope I heard that  
13 correctly, and I want you to elaborate on that, what seeing  
14 and why we're seeing it. And then I have a question for  
15 Tim, a factual question after that, Commissioner Gunda.

16 MS. PALMSTROM: Yeah. So we -- I haven't dug  
17 into the reasons why we're seeing it. I think we could  
18 attribute it to a few things. You just, you have -- you do  
19 have more megawatts that are vulnerable to temperatures.  
20 We're in a drought condition right now. So you are seeing  
21 a lot of hydro facilities at reduced capacity contributing  
22 to outages. You know, when we're hitting these really,  
23 really high temperatures, your gas-fired units, you -- they  
24 just can't get to their max capacity. And so you  
25 ultimately have equipment failures and derates and other

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1 things that happen. So I'm not -- I'm not -- we haven't  
2 dug into the details, you know, of exactly, you know, what  
3 particular. But those are two things that come to top of  
4 mind that, you know, we just weren't grappling with 110  
5 degree weather in the L.A. Basin, you know, in previous  
6 years. So you just didn't have that level of ambient  
7 conditions to, you know, really kind of force some of these  
8 units, you know, offline.

9 COMMISSIONER RECHTSCHAFFEN: Scott, is PG&E  
10 seeing similar things? I just --

11 MR. RANZAL: Yeah. Yeah. And I would echo some  
12 of what Mark's just talking about. I would also think  
13 that, you know, some of the impacts related to Covid on  
14 completing work, calling in 2020. Did schedules get pushed  
15 into 2021 that may have been planned for 2020 and were not  
16 able to do it, execute on it, as a result of Covid  
17 restrictions or things like that. That may be also another  
18 contributing factor to think through. But as Marci  
19 mentioned, there's probably multiple contributing factors,  
20 but the reality is, is that that is -- that it's a true  
21 statement, the outage volume is certainly higher than it  
22 has been in the past.

23 COMMISSIONER RECHTSCHAFFEN: Thank you, and --

24 MS. PALMSTROM: It's --

25 COMMISSIONER RECHTSCHAFFEN: Go ahead, Marci.

1 MS. PALMSTROM: I could also -- I could also add,  
2 you know, we're also starting to see it, you mean normally  
3 we see facilities take outages in like the April timeframe  
4 and October time frame so that they can do maintenance to  
5 their facilities and be ready for the summer, you know.  
6 And we're seeing that there's just less opportunity because  
7 they're needed in those months. We're just having reduced  
8 supply. So I think you're seeing that these -- a lot of  
9 these projects and units are being -- are being pushed to  
10 their max to be able to contribute at times when they would  
11 normally be down for maintenance or other types of  
12 upgrades.

13 COMMISSIONER RECHTSCHAFFEN: Thank you. So from  
14 what the two of you have said, a little bit, some of it, a  
15 little bit may be Covid related, but a lot of it is climate  
16 weather related. [indiscernible] we're facing. Tim, I was  
17 going to ask if I could ask you, switch gear, about the use  
18 of the Glen Canyon unit, yeah, in emergencies. Is -- are  
19 you precluded, are you restricted by federal statute or  
20 otherwise for using it only when certain emergency  
21 conditions are met. Is there an ability to, or interest in  
22 loosening that? I don't know what the -- I don't know what  
23 kind of energy we're talking about here, what kind of  
24 capacity, how much is available. But I'm just wondering,  
25 are you -- what is the restriction that limits you to only

1 those emergency conditions?

2 MR. VIGIL: Those are our -- the Record of  
3 Decision. You know, it's tied to legislation, the Grand  
4 Canyon Protection Act is what set off the Environmental  
5 Impact Study that resulted in those restrictions on normal  
6 operations. Now, there are, you know we're, within the law  
7 there are exceptions. It's called the Emergency Exception  
8 Criteria, that describes it well. And that's what allows  
9 us to do this when all these conditions are met. That's  
10 why we're so serious about meeting all those conditions  
11 before we do it because we have to comply with the law.

12 As far as loosening any of those laws,  
13 that -- that's not very likely. You know, in fact, they  
14 could get more stringent over time, depending on the  
15 conditions below the dam, unfortunately.

16 COMMISSIONER RECHTSCHAFFEN: All right. Well, I  
17 can understand that. If part of it's feeding the Grand  
18 Canyon it's going to be heavily contested water that we're  
19 talking about. Thank you. That answers my question.  
20 Thanks very much.

21 MR. VIGIL: You bet.

22 COMMISSIONER GUNDA: Thank you, Tim.  
23 Commissioner Guzman Aceves, please. You're still muted on  
24 the screen.

25 COMMISSIONER GUZMAN ACEVES: Thank you. My

1 question also for the Munis, Steve and Jon. I know, you  
2 know, we recently for a couple of our proceedings, for a  
3 time limited, have increased our planning reserve margin.  
4 And I know that the ISO went through this exercise,  
5 obviously, and found a shortfall leading to the need for  
6 these authorities to do some of these CPMs, and I just  
7 wanted to understand from, you know, SMUD and LADWPs  
8 perspective, do you have an equivalent Planning Reserve  
9 Margin, or do you have a smaller margin because of  
10 different strategies that you use?

11 MR. OLSON: Thanks for the question,  
12 Commissioner. From a -- from SMUDs perspective, we  
13 generally follow the guidelines and the CPUC and that the  
14 IOUs are also following. So we have maintained 15%  
15 Planning Reserve Margins. We are considering whether to up  
16 that over the next year. I think the question for us is,  
17 as far as our renewable, penetration of renewables within  
18 our footprint, it's where we're probably comfortable at the  
19 15% this moment. I think the question becomes, as we start  
20 or, restart, our portfolio starts to try to turn over and  
21 you have a higher density of local resources. I think  
22 that's when you have to consider going to those higher  
23 levels.

24 But I can tell you that all of the conversations  
25 internally are all about let's try to get to some industry

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1 norms and follow along with what the general market is, and  
2 California best practices are. So we try to adhere to  
3 those.

4 MR. PRUETT: And Commissioner, I'm not certain,  
5 from my role in my company, exactly what the percentages  
6 are when we go into the longer term of, like Integrated  
7 Resource Plans. But I do know that in the 18 month  
8 lookahead timeframe, we try to be at least 20% above what  
9 we think our maximum conditions are going to be at all  
10 times.

11 COMMISSIONER GUZMAN ACEVES: Thank you. And  
12 Steven, a follow up question unrelated to you. In a  
13 earlier panel, we obviously heard about Hoover Dam and one  
14 of the questions I had was related to some feasibility  
15 studies you have been doing for pump storage that might be  
16 feasible there. And I think Mark said that that study  
17 turned out to be not cost effective, which is probably the  
18 case for many of these longer, heavier, and larger  
19 resources. But do you have a different perspective on  
20 that?

21 MR. PRUETT: Well, I really am a fan of pump  
22 storage. You know, L.A.'s had its Castaic Plant for quite  
23 a while now and has had a lot of time to optimize its use.  
24 And now with this big change coming with renewables and  
25 continuing to change and the loads being affected by not

1 just consumer growth or use, but also weather and things, a  
2 lot of moving parts here, that that long-term storage and  
3 that long-term reliable power that we can count on is  
4 increasingly valuable. And I don't know about the  
5 economics back in the day when Castaic was built, but it  
6 sure seems to me that the pump storage economics has to be  
7 looked at in terms of a very long-term payback, and also an  
8 immediate need to optimize the use of those variable energy  
9 resources and maintain reliability at the same time.

10 I don't have a lot of details on what the numbers  
11 panned out to be for the Hoover Pump Storage, but I do know  
12 that they did come in surprisingly high, and I was hoping  
13 they would come in, you know, something more reasonable.  
14 It just seems like it's such a obvious idea and you're just  
15 moving water up a hill. But I suspect the infrastructure  
16 and planning and, as was mentioned earlier, just the longer  
17 term payback becomes a difficult financial factor.

18 COMMISSIONER GUZMAN ACEVES: Thank you.

19 COMMISSIONER GUNDA: Thank you, Commissioner  
20 Guzman Aceves. I just wanted to say we still have another  
21 four minutes. I wanted to check with Commissioner Monahan,  
22 if you might have a question, or President Batjer.

23 COMMISSIONER MONAHAN: I don't. I just really  
24 appreciated the conversation and the dialogue.

25 COMMISSIONER GUNDA: Thank you, Commissioner.

1 Just want to check on the dais. Anybody else might have a  
2 question. I do have one quick follow up, but I want to see  
3 if anybody else have a question.

4 PRESIDENT BATJER: No. Commissioner Gunda, I  
5 don't. I thank my fellow Commissioners for the excellent  
6 questions they asked. So thank you.

7 COMMISSIONER GUNDA: Thank you, President Batjer.  
8 So then I just want to close up on one specific question.  
9 So as we think through Resource Planning and I want to  
10 bring it to the context of California for a minute. So as  
11 we think through especially Resource Planning, which  
12 is -- which is now kind of SB100 goal suggests, you know  
13 there is a need for potentially tripling, quadrupling, you  
14 know, depending on how we plan for reliability, the overall  
15 capacity on the grid between -- over the next 25 years,  
16 which is monumental in itself. But as we think through,  
17 you know, the Resource Planning in the next 5 years, 10  
18 years, as we, you know, imports become an important point.  
19 You know, like you move 1,000 megawatts higher or lower,  
20 the resources needed on the grid are different than now  
21 what we need to procure, additional procurement.

22 So just wanted to get your sense on is, I mean,  
23 when you think about the historical nature of imports, I  
24 mean, is the last three years indicative of the next three  
25 years or five years? Are we, should we be planning, you

1 know, a little bit more conservatively on imports? I  
2 think, you know, I - it is a question that's like bothering  
3 me. How do we think about this? In the short-term we  
4 don't, I mean, there's a lot of questions on having  
5 collaboration's and then trying to have more data  
6 transparency and such, which I think, you know, could occur  
7 over the next two to three years in a robust fashion. But,  
8 you know, as we think through decisions today, how do we  
9 feel about thinking about imports over the next couple of  
10 years, at least? In your -- in your mindset?

11 MS. PALMSTROM: So I can start with that. You  
12 know my, it is my fear that the trend will continue if as  
13 long as we continue to see, you know, heat, high heat and  
14 high coincident demand across multiple states, everybody's  
15 fighting for the same thing. So if we're -- if we're going  
16 to continue with, you know, if the climate's going to  
17 continue throwing us, you know, the weather and the  
18 intensity that it has, my fear is that that trend will  
19 continue. Yes.

20 I mean, we have an increasing need to meet the  
21 net peak, which, you know, from my perspective, is the most  
22 critical times, you know, where we could really use imports  
23 onto the system. And you know, as we see solar come off,  
24 gas-fired for us is already on, and temperatures aren't  
25 dropping. So the only thing there is, to help with that,

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1 is energy storage, which, you know, that's also a long-term  
2 vision. And, you know, I see that increasing tremendously  
3 over the future, in the future. But it's imports. I think  
4 our reliance on imports continues. So I think the big  
5 question is where is -- where is the supply? Where are we  
6 going to -- where are we going to tap into it and how can  
7 we all work together to make sure that we're using it when  
8 we need it?

9 MR. ROTHLEDER: Yeah. I think I agree with Marci  
10 in her assessment. Areas that used to be winter peaking or  
11 now summer peaking. That's a concern. The resources are  
12 retiring and appropriately so, and the mix of resources  
13 replacing them are a different set of resources and will  
14 have different profiles of availability that will affect  
15 import availability. So those trends, I think, will  
16 continue. This is not a -- the -- I think the end of the  
17 trend. I think this is the middle of the trend. And  
18 that's why I think we have to be more cognizant of, and  
19 aware of that availability of import, supply, and  
20 transmission to bring it here.

21 COMMISSIONER GUNDA: Thank you, Mark. I don't  
22 know if anybody else want to add anything from the panel.

23 MR. OLSON: The only thing I'll add and it's kind  
24 of echoing Marci's comment, is this is becoming a vicious  
25 game of musical chairs and it's a zero-sum game. And, you

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1 know, we can move at the end of the day, there's only X  
2 amount of resources available in the west. Transparency  
3 would certainly help us understand exactly what we have.  
4 And you'd love to be able to turn to a simple calculation  
5 and just see what's out there. And I know that that sounds  
6 easier than, said than done, but we need to have that  
7 transparency. But right now we can move the, I guess if  
8 we're going to have rotating outages, we move it around the  
9 grid. But it's going to happen somewhere. And it's just  
10 this deficit of resources. You know, we have to address  
11 that, as an industry.

12 COMMISSIONER GUNDA: Thanks, Jon. Scott looks  
13 like you might have a comment.

14 MR. RANZAL: Yeah. I would -- I would just echo  
15 and agree with what the panelists and Mark have  
16 communicated already. It is -- it is a challenging time  
17 and I -- it's hard to answer the question of should we take  
18 a conservative approach? I guess the question I would ask  
19 there is what question am I trying to answer? Right. Am I  
20 trying to solve for tomorrow? Am I trying to solve for  
21 five years from now. The transparency will help. It will  
22 not solve the problem. And there will be generation and  
23 transmission needs that are going to be put on to actually  
24 address and answer or move forward towards answering these  
25 problems. But the sooner we get those lines of

1 communication open and working, the better information we  
2 get, the more comfortable we get with helping to define  
3 what is a planning answer, what is an operational answer.  
4 And those may be different for a little while.

5           If not -- dropped my headphone. I apologize. By  
6 different I mean trying to answer a little bit different  
7 questions, right? Do I add generation resources today, if  
8 you could invent a power plant right now, I don't think  
9 there's anybody on the panel that would say no, we don't  
10 need it. Right. I think it would be a great answer. Not  
11 as easy as we all know, whatever have --whatever kind of  
12 plant you're putting in place. So there's a lot of  
13 challenges in front of us. And I know that a lot of the  
14 folks are on the phone, as well as a lot of regulatory  
15 agencies are spending an enormous amount of time trying to  
16 solve these problems. And I think just opening up those  
17 discussions has, you know, raised the tension awareness and  
18 has helped people to start thinking through exactly the  
19 questions we're talking about. What will happen today and  
20 what do we need to do for the future, because they're both  
21 critical.

22           COMMISSIONER GUNDA: Yeah, well we're right on  
23 time there, so I'm going to pass it back to Heather, but I  
24 just want to take a moment to thank all the panelists.  
25 Thank you so much for taking the time to discuss this. I

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1 mean, it's really sobering. It's, I think, for all of us  
2 in this industry, I think, you know, there is, regardless  
3 of where we all fall in terms of specific priorities that  
4 might differ here and there, I know we're all pulling  
5 towards the same place. And I just appreciate each one of  
6 you, you know, in your own forums pushing this forward, but  
7 also bringing this collectively for the state, you know.  
8 And I think if we can solve this here, I think, you know,  
9 we can set a good example of both decarbonizing our state,  
10 but also, you know, for the broader rest of the country and  
11 potentially the planet. So thanks from the bottom of my  
12 heart for each of you, for your efforts to keeping the  
13 lights on and, you know, for all your thought leadership.  
14 Thank you. Put that back to Heather.

15 MS. RAITT: Great. Thank you, Commissioner.  
16 Thank you also, again, to Mark, for moderating and to all  
17 the panelists. So now we'll move on to, we have two  
18 presentations and the first one is on Demand Response and  
19 Reliability. And Tom Flynn, who's a principal at the  
20 Energy Commission's Energy Assessment Division will be  
21 presenting. So go ahead, Tom.

22 MR. FLYNN: Thank you, Heather, and thank you to  
23 those of you on the dais as well. Go to the next slide.

24 Thank you. So appreciate this opportunity to  
25 talk about some important work that we're about to embark

1 on relative to demand response. Wanted to cover four topic  
2 areas for you. One is, of course, this is a reliability  
3 workshop. So wanted to tie in or link demand response, the  
4 topic of this presentation, tie that in to its role and  
5 Reliability being part of the solution to help us maintain  
6 reliability. Second area I wanted to cover is a recent  
7 request from the Public Utilities Commission to the Energy  
8 Commission to launch a Stakeholder Working Group Process on  
9 demand response, specifically some issues associated with  
10 the supply side or Market Integrated demand response.  
11 Third area I want to talk about is the CEC's plan to  
12 satisfy that request. Our initial thinking on how to  
13 deliver on that. And then lastly, fourth area, wanted to  
14 tee up some questions, some topics that we want to engage  
15 with stakeholders on at the workshop that we're planning  
16 for the 19th, the afternoon of July 19, from 1:00 to 5:00  
17 to formally kick off the CEC's work to respond to the PUC  
18 request and put some of our initial thoughts in the minds  
19 of stakeholders that plan to attend so that they can come  
20 primed and ready to help us work through some of those  
21 issues. Next slide, please.

22           So again, we're talking about supply side demand  
23 response. I have a couple slides here tying that into the  
24 reliability context. First, here is a simple diagram  
25 depicting a way of depicting demand response that is market

1 integrated or does participate in CAISO markets and is an  
2 important tool in terms of meeting the needs and  
3 maintaining reliability. The box on the left with the  
4 rounded corners is depicting the utility demand response  
5 programs, those that are not shown on supply plans, but are  
6 credit against the Resource Adequacy Requirements or  
7 obligations. In other words, the capacity of those demand  
8 response Programs is counted in a way that reduces the RA  
9 obligations or requirements of those LSEs.

10           And those utilities schedule those resources, or  
11 those demand response Resources into the ISO markets as one  
12 or both of a couple Market Participation Models that the  
13 ISO offers for demand response to participate in this  
14 market. Sorry about the acronyms. The RDRR is the  
15 Reliability Demand Response Resource, which is kind of an  
16 emergency product, and then PDR is Proxy Demand Resource,  
17 which is more of economic Demand response product. And  
18 then over on the right, the other bucket of resources that  
19 participate, Demand resources, that is, that participate in  
20 the ISO markets, are, of course those that are sometimes  
21 referred to as Supply Plan with DR resources. Those are  
22 the DR resources that are shown on Supply Plans of Resource  
23 Adequacy Supply Plans. And those are typically scheduled  
24 into the ISO markets by third party demand response  
25 providers as PDR Proxy Demand Resource. Next slide,

1 please.

2           So second of the two slides in the context of  
3 reliability, you know, over on the right, a very kind of  
4 simplistic depiction of a stack of resources available to  
5 maintain reliability. The point being here that demand  
6 response is a part of that Supply Stack that we rely on.  
7 And you know, when it comes to keeping the lights on,  
8 keeping the grid stable, maintaining reliability, obviously  
9 we all know that requires full use of every resource you  
10 have in that Supply Stack. In terms of some of the issues  
11 with respect -- with respect to demand response, there's  
12 you know, this is just a second point here to acknowledge  
13 that there are different perspectives on how we plan and  
14 account for demand response on the supply side in terms of  
15 capacity methods, performance metrics, that sort of thing.  
16 And so that's kind of a big area of the focus that we'll be  
17 undertaking in our engagement with stakeholders.

18           And then really the bottom line on reliability  
19 is, in this context here of demand response, demand  
20 response is an important resource. And we, you know,  
21 certainly get that it's very important as we embark on this  
22 effort, that we really need to collectively develop  
23 solutions that really unlock the benefits of demand  
24 response, both for consumers and also for the grid, also  
25 for reliability. Next slide, please.

1           So second of the four topic areas I wanted to  
2 talk about is the PUC's request of the Energy Commission.  
3 The, last month on the 25th, the Public Utilities  
4 Commission issued a Decision, publishing a Decision in  
5 their Resource Adequacy Proceeding. And the Decision they  
6 issued, for those who want the number, it's 21-06-029. The  
7 request for the Energy Commission to launch a stakeholder  
8 process, a Stakeholder Working Group Process to address  
9 some of these issues was contained in that Decision. And  
10 there is, you know, sort of broad descriptions contained  
11 within that request to the Energy Commission, but there's,  
12 and then in addition to that, there are very specific  
13 technical issues that the Utilities Commission is asking us  
14 to examine and address in the stakeholder process that  
15 we're about to launch.

16           But in terms of overview, I've listed, you know,  
17 on a kind of a summary level, three of the big ones, you  
18 know, that we are being asked to develop recommendations in  
19 these three areas. One is a more comprehensive and more  
20 consistent measurement and verification strategy for demand  
21 response. A potentially a new or improved methodology for  
22 determining the qualifying capacity of demand response, how  
23 we count it for, you know, in a planning construct, or in a  
24 planning sense, how do we count the capacity that demand  
25 response can deliver?



1           And then thirdly, to the extent the Decision  
2 requests that to the extent we are able, to develop a  
3 recommended qualifying capacity methodology for DR, that we  
4 apply that and develop, use that to develop or suggest some  
5 actual capacity values for demand response. And all of  
6 this for the 2023 Resource Adequacy Compliance year and  
7 beyond.

8           And lastly, we were given a deadline. The PUC's  
9 asking that we submit our recommendations back to them, no  
10 later than March 18th, 2022. Next slide, please.

11           So how are we going to satisfy that request?  
12 Here I just wanted to sort of preview, at a very high  
13 level, our initial planning and our initial thinking on how  
14 we're going to go about doing that. We decided to open a  
15 new docket at the Energy Commission on demand response that  
16 has now opened. And the number on that is docket number  
17 21-dr-01. So that's now open. Its primary purpose is to  
18 serve as a place to build the record on our, you know,  
19 during our effort to develop these recommendations for the  
20 PUC. That's primarily the initial purpose of this demand  
21 response docket. And but then we also secondarily wanted  
22 to have a place to consider emerging issues beyond that,  
23 beyond the delivery of the work product to the PUC in March  
24 of next year. It gives us a place to consider emerging  
25 issues as well.

1           The next step that we plan to take to really kick  
2 this off is in a week and a half hold the first workshop in  
3 this Stakeholder Working Group Process that we're launching  
4 in response to the PUC request. So we'll hold a workshop  
5 on the afternoon of July 19th, as I mentioned. I want to  
6 get, plug that as many times as I can. We want to get lots  
7 of good participation there. And then at that workshop,  
8 we're planning to level-set. What the PUC's ask is get all  
9 the stakeholders on the same page in terms of an  
10 understanding in what the PUC's asking us to do.

11           And then secondly, build or propose a structure  
12 for actually responding to that. And that may involve  
13 working group processes. You know, this is a pretty  
14 compressed timeframe to develop our recommendations, so  
15 we're certainly trying to consider all structures that  
16 would enable us to generate parallel work streams and  
17 develop a high-quality product in a very short period of  
18 time.

19           So for the remainder of the year, beyond that  
20 first kickoff workshop on the 19th, we're anticipating  
21 likely many working group meetings, you know, technical  
22 subcommittee type meetings where people really roll up  
23 their sleeves and get to work and they'll probably occur at  
24 a very rapid pace as we'll need to meet very frequently to  
25 work through the issues and develop those recommendations.

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1           Thirdly, we're thinking towards the end of the  
2 year of bringing this back into an IEPR context,  
3 potentially bring this back to an IEPR workshop towards the  
4 end of the year, maybe December, you know, to be determined  
5 when that would actually occur. But we would like very  
6 much to bring back our progress at that point, to the IEPR,  
7 and get that, kind of recap where we are and get that into  
8 the IEPR record.

9           And then the fourth point here is acknowledging  
10 that the due date for responding to the PUC is by the  
11 middle of March of next year. We want to take advantage  
12 of -- full advantage of all the time we have to develop a  
13 high-quality deliverability product here. So we're  
14 assuming if we make good progress through the end of this  
15 year, that we'll then be able to turn to the early months  
16 of next year, January and February, to actually draft up  
17 our recommendations and then submit those to the PUC in  
18 March. Next slide, please.

19           So this is really the last slide. The fourth  
20 topic area I wanted to talk about, and that is, again, to,  
21 you know, sort of pose some questions, tee up some topics,  
22 if you will, for that workshop. We want stakeholders to  
23 come prepared to help us make some decisions that day in  
24 terms of process, structure, schedule, expectations, work  
25 plans. We really don't want to leave that workshop until

1 we've put together a nice, tight structure for how this  
2 process is going to work, potentially setting up work  
3 groups, naming working group leads, setting expectations  
4 for those work groups, and the first states that one or  
5 more of those will meet and really, you know, make clear  
6 that that workshop is a place where we intend to all roll  
7 up our sleeves and really get to work.

8           So we're hoping that stakeholders will come to  
9 that workshop with their perspectives about how to  
10 structure our stakeholder process to respond to the PUC's  
11 request. We'll certainly, CEC staff, will certainly come  
12 there with some firm ideas and proposals on how to do that,  
13 but we really want to engage in a really productive  
14 discussion, conversation with, and dialogue with  
15 stakeholders on that day so that when we come out of that  
16 workshop, we have a very firm plan in place, scheduled  
17 meetings, due dates, potentially further workshops,  
18 occasionally, to track our progress and drive towards a set  
19 of, a good strong set of recommendations to submit to the  
20 PUC in March of next year. Next slide.

21           So, again, thank you for the opportunity to  
22 introduce here, in this reliability context, some work on  
23 DR that we think is very important. And happy to take any  
24 questions.

25           COMMISSIONER GUNDA: Tom, just -- President

1 Batjer, please. Please, go ahead. Please.

2 PRESIDENT BATJER: Thank you. I just wanted to  
3 thank Tom for the presentation. It was -- it was great to  
4 see the full layout of how you guys are tackling our  
5 request. So really appreciate that and appreciate that  
6 timeframes are being met.

7 COMMISSIONER GUNDA: Thank you, President Batjer.  
8 I think, you know, I was going to share the same spirit,  
9 which is, and I just wanted to thank specifically Simon  
10 Baker, Rob, you know, staff from CPUC who have been  
11 incredible in developing the collaboration on how to think  
12 about DR, and also conversations with CAISO to date, and  
13 all the stakeholders on the DRPs. I mean the two  
14 roundtables we held earlier this year to get their  
15 thoughts. And I'm just glad to see the responsiveness from  
16 CAISO on tackling this year's summer account, the baseline  
17 accounting, and then, you know, just looking forward to  
18 continuing the conversation on this.

19 So just thankful to the entire team, and as  
20 usual, thanks to Tom for his very diligent and then  
21 thoughtful work here.

22 MR. FLYNN: You're welcome. Thank you.

23 COMMISSIONER GUNDA: Commissioner Guzman Aceves,  
24 I don't know if you turned on your camera, if you wanted to  
25 see anything or.

1 Commissioner Monahan, or Commissioner McAllister.

2 COMMISSIONER MCALLISTER: Just want to thank Tom  
3 and express my excitement to work with you on this,  
4 Commissioner Gunda, and just to rope it back into the IEPR,  
5 you know, wrangle it back into the IEPR towards the end of  
6 the year and create something solid and lasting. We've got  
7 -- I think we have the team in place to do that. So it's  
8 going to be good.

9 COMMISSIONER GUNDA: I feel like we need -- we  
10 need to grow our staff by 150% for the next couple of  
11 years. We need a better PRM for our staff. It's just so  
12 hard working. The entire CPUC, CEC, and CAISO staff. It's  
13 been a marathon since last August, and I just want to take  
14 this moment to just thank all the staff across the three  
15 agencies for the incredible work because so many different  
16 domains and aspects. So thanks. Thanks all. I'll give it  
17 back to Heather.

18 MS. RAITT: All right. Thank you, Tom. Thank  
19 you, Commissioner. So our next speaker is Mark Kootstra  
20 and he's going to talk about multi-year Reliability. And  
21 he also, with him is Nick Fugate, who's the lead forecaster  
22 at the Energy Commission, and he's -- so Nick's available  
23 to help with any questions. And then Mark Koostra is the  
24 supervisor of Planning and Modeling at Energy Commission in  
25 the Energy Assessments Division. So go ahead, Mark.

1 Thanks so much.

2 MR. KOOSTRA: Thank you, Heather. Good  
3 afternoon, Commissioners and members of the dais. Today  
4 we're going to talk about the scope, inputs, and  
5 assumptions. Mostly it's phrased as input questions that  
6 we have for folks, which gives some insight into what we're  
7 looking at doing, but we're still pretty open to some of  
8 these things. We have the basic methodology down pretty  
9 solid, we think, but we want to get some input. So we're  
10 looking at an analysis that's driven in large part by the  
11 CPUC Decision to order procurement for 11,500 megawatts of  
12 net qualified capacity by 2026. And specifically, that  
13 capacity without any natural gas capacity in there.

14 Our analysis that we're looking at is really  
15 going to try to answer two questions. The first is if we  
16 need additional capacity to keep us beyond that recent  
17 order and the outstanding orders to get us to a loss of  
18 load expectation of less than one day of unserved energy,  
19 with unserved energy every 10 years. And if we do need  
20 capacity, really, how much is it? And assuming we do get  
21 some capacity needs; does incremental gas capacity improve  
22 reliability in a way that's more beneficial than preferred  
23 resources with the same NQC value. Next slide.

24 Our overall approach that we've been working with  
25 and building up over the past several months is very

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1 dependent on publicly available data. We want to make sure  
2 that we can vet as much as we can and where we can't have  
3 publicly available data, we want to aggregate it up as much  
4 as we can. We've been working primarily with historic wind  
5 and solar shapes from CAL ISO subpoena data but aggregate  
6 it up so that it's impossible to tell what's from what.  
7 But we've been using six years of historic wind and six  
8 years of historic solar shapes and then having those  
9 separate but modeling all wind as one facility and all  
10 solar as another facility, which is the complexity that  
11 we're putting into a model that gets the same result as  
12 modeling everything all at once, or individual facilities.

13 We've have also been using 20 demand shapes based  
14 off of 20 weather years-worth of data that Nick and his  
15 team put together for us based off of the 2019 Demand  
16 Forecast and are working to update that to be consistent or  
17 based off of the 2020 Demand Forecast. And we're hoping to  
18 have that available and posted publicly in the relatively  
19 near term. It'll only be months, May through October,  
20 which is the focus of our study at this point.

21 We are also interested in adding some variability  
22 with hydro right now, and I'll talk about this later, we  
23 model hydro simply without any variability or probabilistic  
24 changes. But that's something we're considering. We pull  
25 these different variables together, and as you can see, we



1 get enough of a lot of possible combinations that we can  
2 run into, especially since we're not linking weather years  
3 for any variables at this point.

4           And then we draw against an essentially unlimited  
5 number of forced outage -- outages. Our goal with this  
6 right now is really to just look at, are the RA eligible  
7 resources able to provide the reliability that we need.  
8 Very similar to a supply stack, and that allows us to make  
9 a lot of simplifications in our assumptions and our  
10 modeling methods. And so it's probably good to start  
11 thinking, or to think about our modeling really as a  
12 stochastic supply stack that's run, or an hourly supply  
13 stack that's run for a full six months where we don't have  
14 to think about the PRM so much. The Planning Reserve  
15 Margin is really designed to cover outages, wind and solar  
16 uncertainty, those things, are built into it, demand  
17 uncertainty, as well as reserve margin, and we're  
18 accounting for those things directly in our modeling by  
19 building in a reserve margin, by building in uncertainty  
20 with wind and solar, and outages as well. The output that  
21 we're looking at is the loss of load expectation capacity  
22 shortfall if the loss of load expectation is above 0.1 and  
23 then characteristics of the outages if they do occur, such  
24 as wind, specific months and hours of the day. Next slide,  
25 please.

1           Once we determine whether or not there is a  
2 capacity shortfall through our modeling method, what we're  
3 going to start looking at, how to best meet that capacity  
4 shortfall. And really specifically, is gas capacity  
5 providing a benefit that preferred resources don't provide.  
6 For the sake of discussion, assume we end up with a 500  
7 megawatt shortfall, what we'll expect to do is then  
8 incrementally add gas capacity, or combinations of  
9 preferred resources, or a combination of gas capacity and  
10 preferred resources in increments, say 100 megawatts, 200,  
11 300, 400, to see how the reliability improves as you add  
12 that capacity in. Depending on how big of a shortfall we  
13 actually see, that'll dictate the size of our increment and  
14 how many combinations we can possibly look at. If we want  
15 to look at and say, you know what, gas capacity really adds  
16 a benefit for the first 100 megawatts, but then there's not  
17 as much of a benefit for the next 2, 3, 400 megawatts,  
18 let's filter in preferred resources and see if there's  
19 complimentary aspects for those, or if it really comes down  
20 to its NQC capacity. The NQC capacity, you know, it  
21 doesn't make a difference. Next slide.

22           Some specific questions we have on some of our  
23 core assumptions, starting off with some demand response.  
24 Right now we're looking at including about 2,200 megawatts  
25 of demand response in our analysis. And this is consistent

1 with the CPUC analysis that fed into the recent procurement  
2 decision. The trick is how you characterize demand  
3 response really makes a difference on how it can show up.  
4 As the study Tom's talking about before, is really going to  
5 show, unfortunately, our time frame is a little bit  
6 different. So we'd like to get some input, specific inputs  
7 we'd like from stakeholders is if there's a limit on  
8 dispatch for demand response that we really should be  
9 considering, number of hours in a year, month, day or  
10 consecutive hours, any kind of energy limitations. We're  
11 also curious if folks have ideas or recommendations for how  
12 we can model or should model demand response when called,  
13 if it increases energy consumption of other hours such as  
14 precooling buildings before a hot period.

15           And finally, should we be incorporating some  
16 uncertainty in DR into the model. This would be similar to  
17 a forced outage for a natural gas plant or something like  
18 that, where it may not show up the way we want, and we  
19 don't know what kind of uncertainty we should be capturing  
20 or if we should capture that at all. Next slide.

21           Turning to imports. We kind of looked at two  
22 different options for handling imports within our model  
23 because we're modeling very simplistically, we only look at  
24 the CAISO territory and only our resource adequacy  
25 resources, or plants, with NQC values or expected to have

1 NQC values. As a result, and imports are typically  
2 modeled, can be the modeled in a couple different ways, but  
3 it's generally a generic import number where we just say  
4 this amount can be delivered at any given time, or we add  
5 side by side to that some specific import. But on the net  
6 qualifying capacity list. So on the left is a table of the  
7 RA import showing that has been seen over the past six  
8 years, their maximum, minimum and average showings by  
9 month. You can see these vary, I will call it that  
10 specifically. That September numbers is a bit of an  
11 outlier compared to all the other values, but it's there,  
12 it showed up before. The other option on the left, you can  
13 see a 24-hour month average import graphic that shows the  
14 10th, 25, 50th, 75th, and 90th quantile or quartile of,  
15 sorry, percentile of imports in August for the past three  
16 years. And this would be economic imports.

17           So we'd be interested if folks have a preference  
18 for which approach we take, if there should be some hybrid  
19 of that. I think it might be kind of excessive to put  
20 restrictions on the 12 o'clock hour. You know, similar to  
21 what we see in the net imports, because that's probably  
22 more associated with a lack of demand for imports at noon  
23 than it is, essentially, for lack of availability of  
24 imports. But we want to make those balances. Next slide.

25           In addition to just the general questions of how

1 we should be considering imports at -- and at what level,  
2 should we be looking at maximum import limit minimum, or  
3 somewhere in the middle, or even just something else. We  
4 would like to have some input on how imports should change  
5 over the steady horizon. Should we be seeing increased  
6 imports for RA, or decreased imports? So we want to be very  
7 aware of the discussion we had earlier this afternoon that  
8 imports may not show up in the way and how we expect in the  
9 future. But if we have some idea of what that may look  
10 like, that we can incorporate. And then also if we should  
11 have any uncertainty related to imports being incorporated  
12 in the model and if so, how? Next slide.

13           So for wind and solar resources and hydroelectric  
14 plants. Right now, as I mentioned before, modeling wind  
15 and solar from historic resource shapes and be linked to  
16 each, and not currently linked for weather years. If we  
17 wanted to link those for weather years, that's something  
18 we'd like some input on. To do that, we'd have to be able  
19 to extend the number of years we have beyond six, which  
20 means we need to shift towards some artificially generated  
21 solar wind shapes, such as the ones the CPUC has produced  
22 in the past and uses. That's an option whether or not we  
23 link over the years, but that's some input we'd like to  
24 have, like where we should go in terms of should we  
25 increase the number of distributions for wind and solar.

1                   Additionally, how do we want to model  
2 hydroelectric? Right now, in our test cases, we've been  
3 modeling hydroelectric as just an NQC value with no  
4 restriction on generation up to that capacity, which means  
5 that a 10 megawatt hydro unit with an NQC value of 10 can  
6 operate at 10 megawatts 24/7 in those periods. There's  
7 obviously some errors with that, but is that something that  
8 we need to focus on and address, or should we just assume  
9 that hydro can show up at that NQC value in the hours of  
10 concern? That's the main goal at the moment. Or should we  
11 start moving towards historic average fixed shapes or some  
12 sort of distribution of historic profiles to account for  
13 uncertainty?

14                   And again, if we do move towards historic  
15 profiles or even artificially generated profiles, should we  
16 be looking at linking weather years with wind and solar or  
17 even possibly demand. Next slide.

18                   Forced outages is another really big assumption  
19 that goes into our model. So we've been tinkering with two  
20 different options for handling forced outages. Both use  
21 the forced outage rates that you see on the table right  
22 now, as well as the mean time to repair, which is the  
23 average time it takes for the forced outage to no longer be  
24 held on that plant. Applying these outages by each  
25 individual plant potentially captures more of the potential

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1 chunkiness of some of those outages where you would see  
2 1,000 megawatt plant out, when it is out as opposed to  
3 maybe a bit more of a smooth distribution when we try to do  
4 outages by the estimated standard unit size.

5           The way we use the standard unit size, so as for,  
6 say the thermal plant that are cogen. If there's  
7 approximately 29,000 megawatts of those types of resources  
8 in the model, or available to the model, we divided up into  
9 290 100 megawatt units, which then allowed us to prepare a  
10 little bit more of a smooth shape potentially. On average,  
11 you see about, I think it was 21 of those units out at any  
12 given time, but that varies substantially up and down.  
13 This potentially allows us to capture better partial  
14 outages at plants in a way that our individual plant forced  
15 outage doesn't because it -- the plants are either out or  
16 not. But we'd like some feedback on that. If you go to  
17 the next slide.

18           One of the things that we'd like on that is  
19 really if we do move forward with the standard unit size,  
20 what's the appropriate standard unit size? And what should  
21 that be for each technology type. In general, for forced  
22 outages, we'd like to have information or thoughts on what  
23 forced outage rates should be used for each technology,  
24 what's the average duration we should use, as well as are  
25 we applying forced outages to all the technologies we need

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1 to. Right now, the wind and Solar Shapes profiles, because  
2 we're using historic profiles, have outages, as well as  
3 curtailment already built into them. But we don't have any  
4 forced outages at the moment for batteries or hydro at this  
5 time.

6           And then also, should we be looking at more  
7 specific technology types? The forced outage profiles may  
8 be substantially different between peaking units and  
9 combined cycle units. And is that something that we need  
10 to account for explicitly, or can that be handled by some  
11 sort of averages? It's going to be a lot more easy to  
12 handle by some sort of average if they have the same mean  
13 time to be up again. But if both the forced outage rate  
14 and the mean downtime are different, that's where we need  
15 to start thinking about separating. That'll help in a  
16 substantial way. Next slide.

17           The last thing that we're really looking for  
18 input on is the straw proposal for a resource build. I  
19 want to be clear, this is a straw proposal and it's meant  
20 to facilitate discussion and comment. A couple of things  
21 to note with this is that we just assume that all wind and  
22 solar is paired with energy storage on a one for one basis,  
23 on a power capacity basis. That's in part because the  
24 marginal ELCC values for solar are, get really low there,  
25 about 2% going out to 2026, which means if you have 1,000



1 megawatts of NQC solar included in the model, you end up  
2 with 50, or you end up with about 50,000 megawatts of  
3 installed capacity, which just doesn't seem reasonable in  
4 the next five years.

5           And I also like to note that of the 2,500  
6 megawatts of capacity specifically for the Diablo Canyon  
7 replacement, 1,000 megawatts of that is coming online in  
8 2024, by these tables. So that we meet all the  
9 requirements, in essentially the most efficient way  
10 possible to minimize the total amount of resource build  
11 we're dealing with. Again, we want to do some more  
12 analysis on this. If you go to the next slide.

13           But some specific questions we'd like input on  
14 is. What's the right resource mix for this? For hybrid  
15 resources, what should the ratio be for energy storage  
16 generation capacity? Should it be different for wind and  
17 solar plants? And is there -- is it reasonable to expect  
18 significant capacity will come online prior to the required  
19 date? Otherwise we'll just assume that stuff comes on at  
20 the last possible minute if we can't find some way to be  
21 reasonable about those assumptions. If we go to the next  
22 slide.

23           Along with all the other comments for today, we  
24 are very interested in folks input by July 23rd, though I'm  
25 happy to get more input earlier. When you are putting

1 comments together, we'd really appreciate any opportunity  
2 you have to present, or to include sources, rationale, and  
3 numbers in your response and that will help us incorporate  
4 and analyze what you're suggesting faster. It allows to  
5 incorporate, where possible, in this effort rather than a  
6 future effort. And please identify any of the things we  
7 need to consider. We are hoping to release the final  
8 analysis in September this year. So we're definitely going  
9 in earnest and we're eager to get started.

10 With that, I'm happy to answer any questions you  
11 might have.

12 COMMISSIONER GUNDA: Thank you, Mark, for the  
13 presentation. I think, you know, I've been following this  
14 carefully with you, so I would really want to reserve some  
15 time for other Commissioners who might have questions and  
16 I'll come back at the end. So looking if anybody wants to  
17 jump in here.

18 PRESIDENT BATJER: I just got a little  
19 distracted. I got a little distracted because we had an  
20 earthquake during your presentation. So.

21 MR. KOOTSTRA: It was a little distracting on my  
22 end as well.

23 PRESIDENT BATJER: So you felt -- you felt it as  
24 well, Mark? I don't know where you are, but.

25 MR. KOOTSTRA: I didn't -- I'm a little north of

1 Sacramento. I didn't really feel it but the background  
2 chat that we have for administrative stuff just kind of lit  
3 up and that was a little like. My wife and kid also  
4 talking in the background.

5 COMMISSIONER MONAHAN: That's impressive, Mark.

6 COMMISSIONER MCALLISTER: Yep.

7 PRESIDENT BATJER: So I got a little jittery  
8 there for a few minutes. So I'm sorry, Commissioner Gunda.  
9 I don't think I have any questions, although I was  
10 following closely until we started shaking.

11 COMMISSIONER GUNDA: So you know, President  
12 Batjer, I mean, this is -- is what an amazing or incredible  
13 time that we're just going through. I mean, like, you  
14 know, so the drought, the heat, you know, with Covid, you  
15 know, they're kind of so --

16 PRESIDENT BATJER: Then the cicadas came. The  
17 cicadas came out this year too. The 17-year cicadas came  
18 out.

19 COMMISSIONER GUNDA: Wow.

20 PRESIDENT BATJER: I forgot we have them on the  
21 west coast.

22 COMMISSIONER GUNDA: Wow. Just incredible. So I  
23 think, you know, I just want to recognize, again, the  
24 partnership between the two agencies, you know, for since  
25 last August, September timeframe, the three, the two

1 agencies, CPUC and CEC have been very well coordinated on  
2 the supply side analysis and because CAISO is a party to  
3 some of these topics at CPUC, you know, sometimes they're  
4 not directly engaged with some of our conversations. But  
5 to the extent that CAISO are able to, they also are a part  
6 of this conversation. So I think overall, I just want to  
7 commend, you know, the opportunity for the two agencies to  
8 work together really well on this. This is an important  
9 ask, and I'm proud of the CEC team for putting the time to  
10 develop the necessary framework on how we want to model.  
11 So kudos to Mark and his entire team. But I just want to  
12 see if any of the Commissioners have any questions here.

13           President Mainzer. Okay. I'll start with  
14 Commissioner Monahan please.

15           COMMISSIONER MONAHAN: Yeah. I, Mark, I was  
16 curious. That's a lot. You were running a lot of  
17 scenarios, as you pointed out. And I'm just curious about  
18 why so many because of the perturbations, I mean, there's  
19 going to be so much so like almost more than one can figure  
20 out how to navigate.

21           MR. KOOTSTRA: Yeah. So we've been running it  
22 probabilistically. So we're looking at aggregated results.  
23 So we've been using PLEXOS, which is our modeling software,  
24 to randomly select the draws on each of those variables and  
25 the forced outages. And so we've been primarily focused on

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1 a very limited number of outputs, which we can process in  
2 an aggregated fashion. So we're not looking at, I think  
3 the last set of test runs we were doing was 20,000 samples.  
4 We're not looking at each sample. We just, we can't.  
5 We're using some computer code to process it and pull out  
6 what we need, but that limits what we can look at in  
7 detail. But that's some of the analysis we need to do is  
8 to do smaller sets where we can look at some of the  
9 behavior more and then go back to the bigger stuff as well.

10 COMMISSIONER MONAHAN: When you do sort of, you  
11 know, worst case, best case, does that -- is that part of  
12 the modeling. Would you run a worst-case scenario?

13 MR. KOOTSTRA: Right. Yeah. So we don't -- we  
14 can run a worst-case scenario, what we hardwire and say,  
15 you know what, imports are at the minimum. Or we get no  
16 imports this year, let's see what happens. We can do that  
17 type of thing, but we're intentionally trying to capture  
18 the probability or the likelihood of events across the  
19 board, which means we aren't intentionally going through  
20 and saying, let's pick the worst solar shape, let's pick  
21 the worst wind shape, let's pick the worst forced outage.  
22 We want to look at it more as a probability because all  
23 those things together are going to behave differently than  
24 each one individually.

25 So we aren't necessarily looking at the worst

1 case within that; we'd be setting up our overall scenario  
2 to look at a worst case. And that may mean that we back  
3 out some of the randomness that we introduce, but so far,  
4 we haven't intentionally backed out randomness to get at  
5 worst possible cases is where it is. Because then that  
6 doesn't always make sense when we're looking at a  
7 probabilistic output.

8 COMMISSIONER GUNDA: Thank you, Mark. I don't  
9 know. Commissioner Rechtschaffen, did you need to go?

10 COMMISSIONER RECHTSCHAFFEN: Yes. I just wanted  
11 to thank you, Commissioner Gunda and Mark and his team for  
12 taking on this. And now it's going to be extraordinarily  
13 helpful to the work we're doing in the Integrated Resource  
14 Planning and our other procurement effort. I just want to  
15 express my deep appreciation for what you're doing.

16 COMMISSIONER GUNDA: Commissioner Rechtschaffen,  
17 you know we know. I mean I want to make sure that I'm  
18 making you proud. For those of you who do not follow that,  
19 that's an inside joke. But going, I don't know who else  
20 want to comment. President Mainzer, it looks like you want  
21 to comment.

22 PRESIDENT MAINZER: Yeah, just really quickly. I  
23 was going to say, Mark, you asked a lot of questions. I  
24 don't know whether those are -- those are questions that  
25 you, as the team are grappling with, or questions that you

85

1 actually wanted guidance on. I think my days of being able  
2 to provide you with technical guidance to those questions  
3 are long past, but certainly to the extent which our teams  
4 are available to provide you any insights, any assumptions,  
5 to sort, you know, kind of get the cleanest look, that  
6 gives its most insight, feel free to reach out to my crew  
7 and happy to support in any way we can.

8 MR. KOOTSTRA: Thank you. To be clear, we are  
9 interested in stakeholder feedback on those things. These  
10 are all questions we're grappling with. But we realize,  
11 especially when you get to like a resource build, we may be  
12 able to optimize for some things and make sure we're  
13 checking out some stuff. But that doesn't mean it's going  
14 to show up in the real world that way. And we'd like to  
15 incorporate as much stakeholder feedback as we can,  
16 recognizing the limited timeframe.

17 PRESIDENT MAINZER: Super. Thank you.

18 COMMISISONER GUNDA: Yeah. President Mainzer,  
19 just on the one, I would really appreciate CAISO, you know,  
20 being able to provide your feedback, and as a -- as a way  
21 just kind of asking the entire stakeholders who are  
22 attending, in attendance today, to just, we would really  
23 appreciate your input on this, on these questions. So. I  
24 don't know if we have any other questions from the dais.  
25 Commissioner Guzman Aceves, I'm just looking at you now.

1 Just looked like it. Great. So I think for me, I'll just  
2 say thanks to both you, Mark and Tom, for the presentations  
3 and the continued collaboration between the two agencies  
4 and just pass it back to Heather.

5 MS. RAITT: Great. Thank you, Commissioner, and  
6 thank you Mark, again. And thank you, Tom. So we don't  
7 have any questions from attendees from Q&A so we can just  
8 go straight to public comment. And RoseMary Avalos from  
9 the Public Advisor's Office is here, and she can moderate  
10 those for us. So go ahead, RoseMary. Thank you.

11 MS. AVALOS: Thank you, Heather. Okay. I'll go  
12 ahead and call on folks with the raised hand in Zoom. And  
13 please state your first and last name, and could you please  
14 spell it also for the record. And let's see here also, if  
15 you -- if you have an affiliation, please name the  
16 affiliation as well. And also do not use a speakerphone  
17 feature when talking, because we may not be able to hear  
18 you clearly. I'll go ahead and call on Issam Najm. You  
19 may speak now. And you may need to unmute on your end when  
20 you're ready.

21 Mr. NAJM: Okay. Thank you.

22 MS. AVALOS: Go ahead.

23 Mr. NAJM: Thank you. My name is Issam Najm.  
24 That's I-S-S-A-M, N-A-J-M and I'm a resident of Los  
25 Angeles. Commissioner McAllister made it a point to ask



1 for public input on the reliability discussion, and I would  
2 like to provide comment on that, if possible. For any  
3 operation, the goal of increasing supply reliability is in  
4 direct conflict with the goal of lowering operating cost.  
5 If an entity has a primary goal of lowering cost, then it  
6 will be forever resistant to ensuring supply reliability to  
7 the level they should. And the reason is simple. Raising  
8 reserve margin costs more money and does not generate  
9 income. You can hear the difference between the points  
10 emphasized by Southern California Edison and PG&E's  
11 representatives in the panel this afternoon about their  
12 cost centric focus, and the points emphasized by LADWP and  
13 SMUD about their operational strategies of maintaining  
14 reliability and raising reserve margins.

15 My suggestion is to make a genuine effort to take  
16 a closer look at the internal drivers at a public power  
17 agency, and at a minimum find a way to require it from the  
18 private power companies. But as long as power utility has  
19 the operational model that prioritizes cost over  
20 reliability, you cannot achieve the goals you have set for  
21 the state. This will require a cultural change at the  
22 CPUC, and I hope the Commission will consider this  
23 seriously. Thank you for the time.

24 MS. AVALOS: Thank you. The next commenter is  
25 John White. Just a moment here. And again, please state

1 your name, and spell your first and last name and speak of  
2 any affiliation you may have. Okay. Go ahead, John. You  
3 may need to unmute. Okay. There you go.

4 MR. WHITE: Thank you very much. And again,  
5 thanks to all the Commissioners for your participation  
6 today. It's really good to have these kind of joint  
7 meetings and discuss and debate and to get data on what's  
8 going on. We are very much encouraged by this examination  
9 of the forced outage rates on the gas side. And  
10 the -- what we think it tells us from what we've seen and  
11 what we already know, is that we're using the oldest  
12 dirtiest gas lines to keep the lights on, but that's  
13 causing other impacts, including price spikes on gas that  
14 flow through the electric system. If you look at the price  
15 of the City Gate or the Burner Tech Gas during the flex  
16 alerts, it's clear how expensive this strategy is.

17 At the same time, we have a mind set about  
18 resource adequacy and reliability that makes the  
19 alternative resources all have to look like and act like a  
20 gas plant in order to get paid. And in fact what we need  
21 are a series of attributes, that the system needs, over a  
22 cost many hours of the day, not just at the net peak. And  
23 the ability, particularly of hybrid resources where you  
24 have solar and storage often occupying the same near site  
25 and the same transmission, is an opportunity to take

1 advantage of these technologies. And we think once we get  
2 experience with them, we will see that there may be greater  
3 benefits to the resources in combination than the resources  
4 individually. So we need the PUC to have a holistic  
5 examination of the attributes and the ability of different  
6 combinations of resources to meet those attributes.

7           We know that we're going to have to see the  
8 performance in the field, that the ISO is going to have to  
9 know that they can count on these resources, but we need to  
10 get started and get experience with them. So we're hopeful  
11 that in the upcoming procurement, as well as the analysis  
12 that the CEC is doing on behalf of the PUC, will gain some  
13 new insights into the value, particularly of demand  
14 response. You know, it's unfortunate that we have less  
15 demand response today than we had five years ago, by a  
16 significant degree. And I, part of that comes from the  
17 sort of reluctance to pay for the demand response and the  
18 idea that we're somehow subsidizing customers to do demand  
19 response. But if you look up what the value of that demand  
20 response is and what it enables in terms of savings,  
21 particularly in terms of gas and promoting more stable  
22 reliability.

23           We've got to get good at demand response and  
24 flexible load because they're going to be increasingly  
25 important, both in terms of the type conditions we face

1 across the west, but also as we move to decarbonize,  
2 flexible load, and demand response. They're going to be  
3 really important tools in the toolbox, so we need to expand  
4 our understanding and get some experience. Thank you very  
5 much.

6 MS. AVALOS: Thank you. Now I'd like to move on  
7 to phone users. Just a reminder to dial \*9 to raise your  
8 hand. I'll give a few seconds to see if anyone that is  
9 using the phone, would like to raise their hand and make a  
10 comment.

11 Okay. Seeing there are no raised hands, that  
12 completes public comment. And I'll turn to Commissioner  
13 McAllister.

14 COMMISSIONER MCALLISTER: I'll leave the close  
15 out to Commissioner Gunda who's actually here for the  
16 session today. So thank you, Rosemary. We really  
17 appreciate your help.

18 COMMISSIONER GUNDA: Yeah. Thank you,  
19 Commissioner McAllister. Just wanted to say just a couple  
20 of things. So first of all, thanks to all the  
21 Commissioners for being here as well as, you know, Elliot,  
22 for being here through the entire day to hear this  
23 discussion. And I know we are all kind of hearing this  
24 together to advance some of the core areas that we're all  
25 interested in.

1           I just want to note that the staff that put  
2 together this workshop are the same staff that has worked  
3 on reliability issues two weeks ago, and the same staff  
4 that are writing reports for the summer reliability. It  
5 has been a monumental task for a lot of the staff, both at  
6 CEC, CPUC, and CAISO. Just want to take one more time to  
7 recognize all of their efforts without whom any of this is  
8 possible. So thank you to the entire three agency staff on  
9 this on these issues.

10           I do want to specifically note a couple of staff  
11 members from CEC, Aleecia from, Aleecia Gutierrez, the  
12 deputy for the Assessments Division, and also David Erne,  
13 who is the Supply Office Manager, who has just -- we have  
14 been fortunate to have him in the -- in the Assessments  
15 Division and really doing a wonderful job pulling all this  
16 together. And as usual, to the IEPR team. Heather, I  
17 don't know how you do it. So thank you to you and the  
18 entire IEPR team for kind of making this happen.

19           So with that, I really would like to invite  
20 other, you know, Commissioners on the dais to just to share  
21 your - share your thoughts before we close today.

22           PRESIDENT MAINZER: I think you said it  
23 beautifully, Commissioner, thank you for the engagement  
24 this afternoon. I really appreciate it and I share your  
25 sentiments about all the incredible hard work of staff and

1 all involved. Thank you.

2 COMMISSIONER GUNDA: President Batjer.

3 PRESIDENT BATJER: I add my thanks and that of  
4 the CPUC too. These workshops are so important, and they  
5 do take an awful lot of work to put on. Lots of really  
6 good information, both this morning and this afternoon,  
7 some of it very challenging and very challenging. And it  
8 shows that we have a lot of work ahead of us and some of it  
9 is right in front of us, not far away. So I think we're  
10 well underway. But this is a lot of information that we  
11 need to digest, all of us together, working closely as we  
12 have been. So thanks to the CPUC staff, the CEC staff, and  
13 CAISO. Thank you all.

14 COMMISSIONER GUNDA: Thank you, President Batjer.  
15 I don't know if any other Commissioners want to comment. I  
16 don't see any.

17 So with that, I will pass it back to Heather. I  
18 think we are done for the day. Thank you.

19 MS. RAITT: Yep. We're done, and I'll just  
20 invite everybody to join again tomorrow morning at 10:00  
21 for the second day. And our third session will be on Gas  
22 Reliability and Polar Vortex Impacts and Implications. And  
23 so thank you, everybody, so much for the day. And we'll  
24 see you tomorrow.

25

1 (Whereupon the Joint Agency Workshop adjourned at  
2 4:17 p. m.)  
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I do hereby certify that the testimony in the foregoing hearing was taken at the time and place therein stated; that the testimony of said witnesses were reported by me, a certified electronic court reporter and a disinterested person, and was under my supervision thereafter transcribed into typewriting.

And I further certify that I am not of counsel or attorney for either or any of the parties to said hearing nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand this 8th day of October, 2021.



MARTHA L. NELSON, CERT\*\*367



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I certify that the foregoing is a correct transcript, to the best of my ability, from the electronic sound recording of the proceedings in the above-entitled matter.



October 8, 2021

MARTHA L. NELSON, CERT\*\*367