

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



FILED

06/13/19
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Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Refinements, and Establish Annual Local and Flexible Procurement Obligations for the 2019 and 2020 Compliance Years.

Rulemaking 17-09-020
(Filed September 28, 2017)

**COMMENTS OF THE UTILITY REFORM NETWORK
ON THE TRACK 3 PROPOSED DECISION**



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June 13, 2019

COMMENTS OF THE UTILITY REFORM NETWORK ON THE TRACK 3 PROPOSED DECISION

The Utility Reform Network (TURN) submits these comments regarding the Proposed *Decision Adopting Local Capacity Obligations for 2020-2022, Adopting Flexible Capacity Obligations for 2020, and Refining the Resource Adequacy Program* (PD), issued in Track 3 of this docket on May 24, 2019.

TURN is limiting these comments to the PD's conclusions regarding the Effective Load Carrying Capability (ELCC) factors that should apply for the 2020 Resource Adequacy (RA) compliance year. In Reply Comments, TURN may respond to parties' comments on other issues.

Though the revised ELCC factors the PD would adopt¹ appear to be broadly reasonable, TURN takes no position on whether the Commission should adopt them for 2020. TURN is instead concerned that Energy Division's (ED's) adaptation of the ELCC methodology for California-specific issues – such as monthly Planning Reserve Margins and the large quantities of both renewable and storage resources² – may be pushing the ELCC methodology far beyond what it was intended to do – and possibly beyond what it reasonably can do. Further review, and possibly modification, of ED's ELCC methodology is necessary. Therefore, TURN supports the Commission's direction for additional analysis of such issues.³

TURN appreciates the opportunity to submit these comments.

¹ See Appendix A of the PD.

² Including combined units containing both renewable generation and storage.

³ See Ordering Paragraph 19.

Dated: June 13, 2019

Respectfully submitted,

By: _____/s/_____
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