

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

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

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

**COMMENTS OF THE INDEPENDENT ENERGY  
PRODUCERS ASSOCIATION ON THE SCOPING MEMO  
AND RULING ISSUED JANUARY 18, 2018**

INDEPENDENT ENERGY PRODUCERS  
ASSOCIATION

Steven Kelly, Policy Director  
1215 K Street, Suite 900  
Sacramento, CA 95814  
Telephone: (916) 448-9499  
Facsimile: (916) 448-0182  
Email: [steven@iepa.com](mailto:steven@iepa.com)

Dated: January 30, 2018

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

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

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

**COMMENTS OF THE INDEPENDENT ENERGY  
PRODUCERS ASSOCIATION ON THE SCOPING MEMO  
AND RULING ISSUED JANUARY 18, 2018**

The Independent Energy Producers Association (IEP) is pleased to comment on the Scoping Memo and Ruling of the Assigned Commissioner and Administrative Law Judge in R. 17-09-20. The proceeding will consider resource adequacy (RA) program refinements while establishing annual, local, and flexible resource adequacy capacity procurement obligations for the 2019 and 2020 compliance years.

Overall, IEP is supportive of the procedure outlined in the Scoping Memo. The Scoping Memo creates Track 1 with a decision scheduled by June 2018. Track 1 will address some critical matters including the adoption of local, flexible, and system capacity requirements for the 2019-2020 compliance year such that load-serving entities will have sufficient time to procure needed resources to make their annual showing. Importantly, Track 1 will resolve a number of time-sensitive policy matters that may affect program design, including consideration of a multi-year framework, centralized procurement, and the alignment of RA measurement hours with CAISO availability assessment hours.

IEP also supports the Scoping Memo's determination that workshops are the best mechanism for addressing the issues associated with the Track 1 policy matters. We do not believe hearings are needed; alternatively, we firmly believe that hearings will undermine the goal of rendering a final decision on these policy matters no later than June 2018. To the extent that additional implementation details need to be resolved, then Track 2 of the proceeding is the proper venue for considering implementation matters. Indeed, Track 2 is already tasked with the responsibility of adopting refinements to the adopted policy, including consideration of specific rules governing implementation that have yet to be decided.

IEP looks forward to working with the Commission on the essential issues associated with the RA framework and RA implementation identified in the Scoping Memo. Timely decision-making on this critical matters, particularly those addressed in Track 1, will send much needed market signals to suppliers, load-serving entities, and policymakers with regards to ensuring that sufficient capacity is available when and where needed to help ensure critical grid reliability.

Respectfully submitted January 30, 2018, at San Francisco, California.

A handwritten signature in black ink that reads "Steven Kelly". The signature is written in a cursive, slightly slanted style. The first name "Steven" is written in a more compact, rounded script, while "Kelly" is written in a more open, flowing script. The final letter of "Kelly" is a large, sweeping flourish that loops back under the word.

INDEPENDENT ENERGY PRODUCERS  
ASSOCIATION

Steven Kelly, Policy Director

1215 K Street, Suite 900

Sacramento, CA 95814

Telephone: (916) 448-9499

Facsimile: (916) 448-0182

Email: [steven@iepa.com](mailto:steven@iepa.com)