

“A teacher enlarges people in all sorts of ways besides just his subject matter.”

Wallace Stegner

“Never fail to know that if you are doing all the talking, you are boring somebody.”

Helen Gurley Brown

“One of the things Kuhn said about normal science is that people 'expect' things to be discovered”

Ian Hacking

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Alternatively, you can subscribe for a Meatless Burrito that eliminates the Below the Belt section by sending me [an email](#). A history of the Western Power Trading Forum (WPTF) including a section on the evolution of the Friday Burrito can be found by clicking [here](#).



The WPTF General Meeting last week in Carlsbad, California was dreamy. The weather was sublime, the fellowship rich and thick as porridge, and the presentations intellectually stimulating. After a lengthy absence of collegial gatherings, one cannot over-emphasize their value when done right ... and this event was *perfecto*



in every way. I engaged in conversations with old friends about their lives over the last two years or so. Topics included surviving wildfires, aging parents, growing children, and life at home. For example, Julie McLaughlin reminded me (actually several times) that she looked different to me because the last time we saw each other was when she was six-months pregnant with her first child, Matias. I guess that explained it. In another example, Greg Wolfe recounted that last year during the wildfires well east of his pastoral acreage outside of Portland, he helped ranchers threatened by the smoke and flames by temporarily corralling their horses. He showed me a pic (left) where horse owners who couldn't safely re-home their animals spray painted the owner's phone number on the side of the horses, set them loose, and hoped for the best. Might be a good canvas for political ads, perhaps on another part of the horse's anatomy. "How am I Doing? Call ... "

The Northwest Power Pool (NWPP) announced a name change last week. Henceforth it will be known as the Western Power Pool (WPP), which makes it look like about a half-dozen other associations that have similar call letters ... e.g., WECC, WSPP, WIRAB and WRABIES. Okay, I made up the last one but the others are firmly ensconced in our western consciousness. The press release for WPP stated: "With the recent award of the service contract for the NorthernGrid transmission planning ... and the ongoing development ... of the Western Resource Adequacy Program (WRAP) ... the Northwest Power Pool is finalizing a rebrand of its business name to the Western Power Pool (WPP)." The name change is evidence of greater regional integration. We are de-parochializing. Follow the trend as follows: We are de-cooling thus de-carbonizing which means de-thermalizing and, of course, that leads to de-parochializing. What's next? De-populating, de-foresting, or defoliating?

Moving on to other obscure topics, the Net Energy Metering (NEM) mess continues. The media has pounded this one to death. The Cappuccino has been wise to hold off voting on the proposed revisions and thereby letting a strong push-back on rational regulation from some (but not all) environmentalists and all (not some) solar rooftop vendors calm down a bit. Oh yeah, and then there's former California Gov Schwarzenegger who has been

Western States Playbook

EPSA Competitive Power Summit:
Tuesday, March 29, at the National Press Club, 529 14th St NW, Washington, DC.
From 8:35 a.m. to 4:30 p.m. To register and pay online click [here](#).

WPTF on LinkedIn: Follow the group on LinkedIn by clicking [here](#).

bitching up a storm in the [NYT](#) about his fave state losing the climate bragging wars. Can we have some common sense, please? Yes, and in fact a voice of reason came this week from Jim Bushnell at UC Davis in his blog posted on the UC Berkeley [Haas Business School Energy Institute Blog](#). It is entitled, "Everyone Should Pay a 'Solar Tax'." Jim reduces the NEM landscape pithily with the following observation: "Over the last few months there have been several head-scratching and, I would argue, misguided arguments put forward in favor of preserving the NEM status quo. The most curious one is the widely circulated argument that NEM reform would constitute a step backwards in California's climate leadership. In fact, the opposite is true." The key problem with the current NEM tariff design is that non-solar rooftop dwellings are paying an ever-higher price for electricity that in turn retards home and business electrification. "Higher electricity prices make the shift to electric vehicles, space heating, and water heating less and less appealing to the majority of Californian's whom the state's own climate scoping plan is counting on to electrify their lifestyles." Further, Jim adds: "Residential rooftop solar isn't the only way to generate clean electricity. It's not even the only way to generate *solar* electricity. It is only the *most expensive* way to generate clean electricity." His source is the well-regarded Lazard research on leveled energy costs.

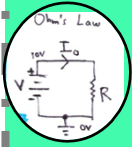
Jim's proposal is not new but is elegant and worthy of repetition since the concept seems to lack political traction: "The solution, which makes too much sense to ever be widely adopted in California, is to make NEM irrelevant. We have spent too long arguing about the rates paid by solar homes and not enough time talking about the rates paid by everyone else. The proposed monthly fixed charge (e.g., solar tax) is simply a means of recovering the fixed costs of distributing electricity in California. But we shouldn't stop at only the solar homes. The road to electrification is to shift *everyone* to a rate structure that encourages electrification, one that accurately reflects the high costs of connecting to the grid and the low costs of actually consuming electricity ... This means moving everyone to a monthly connection charge and lowering the marginal price of electricity by an amount that offsets the revenues raised by the connection fees." You can sense his frustration about the lack of a monthly connection fee. There is a connection fee now, but it is so low that it's as good as zero.

What we believe...

1. Competition yields lower electricity rates.
2. Stable and transparent rules and regulations promote private investment.
3. Private investors, rather than utilities, will spend money on new power plants and transmission facilities if they can earn a return that is balanced with the risks.
4. Private sector investment results in lower average prices without risking consumers' money.

On the other side of the argument was an [editorial board piece in the LA Times](#) dated February 6 entitled, "California Can't Enact a 'Solar Tax' and Still be a Climate Leader." Surprising to me that the liberal [Times](#) would be eager to trample the middle- and lower-income classes to uphold a legacy that is as paper-thin as tinsel. Apt, no? Here is the crowning statement: "It makes sense to scale back incentives over time as the market matures and as prices fall. But regulators should not move forward with something so drastic that it could derail one of California's most successful clean energy programs, at a time when we need leaders to be using every tool at their disposal to hasten emissions reductions. Doing so wouldn't only be bad for the climate, it threatens to exacerbate inequality just as solar is starting to be adopted by increasing numbers of low-income Californians, who are all too often excluded from the benefits of clean energy." I don't know what kind of horseshit this editorial board smokes, but the clueless idea that lower-income households are somehow benefitting from the excesses of the wealthier solar rooftop homeowners is appalling. Renters, for example, are not. Further, as Phil Muller explained in the January 28 Friday Burrito, all sorts of protections in the CPUC proposal for low-income households are included. Why is it the job of California's economically disadvantaged households to continue to prop up the solar rooftop industry?

Thus, Jim Bushnell argues that a cost-based monthly connection fee should be placed on all electricity customers, and the [LA Time](#) editorial argues, "Commissioners ... must significantly dial it back and abandon the idea of a new monthly fee."



Catch Some Z's

[Click here to learn more about Ziad Alaywan](#)

“What is the Point (to point)?”

The Congestion Revenue Right (CRR) is a feature of the CAISO markets that is used to hedge transmission congestion. The CAISO allocates some CRRs to Load Serving Entities (LSEs) and auctions the remaining to all market participants. LSEs also receive auction revenues. Participants buy or sell CRRs corresponding to specific source/sink pairs in the annual auction. The CAISO's day ahead market calculates the congestion cost based on the difference in day-ahead market prices between two locations. In around 2018, CAISO made a major modification in the CRR market after concluding that the CRR market from 2009 to 2017 was not working. As the DMM described CRR market results, “These results are not consistent with a well-functioning competitive market” because, “Ratepayers paid over \$1.4 billion to non-LSE CRR holders but received only \$742 million in auction revenues” over 8.5 years. The CAISO action was controversial, and many participants criticized such a blatant anti-market move which FERC approved.

To prevent CRR auction participants from collecting auction proceeds that exceed congestion proceeds, the CAISO introduced a post processing backdoor, called “revenue deficiency offset.” For instance, a year in advance, a supplier or Generator can purchase CRRs in the CAISO auction and attempt to hedge its congestion cost by buying a point-to-point CRR from the generation injection point to the delivery at the hub. The generator would receive the congestion rents between the two transmission points. If the auction payment equals the congestion rents, then the hedge is perfect. The congestion rent is seldom equal to the auction price. The new market rule uses a complex reallocation after the fact to readjust the Settlements with market participants. This post processing could greatly modify the results of the CAISO market in an unpredictable way. This is like buying a stock at a \$1, selling it at \$1.5 and receiving an invoice clawing back for \$0.5.

It is also a short-sighted approach when analyzing a feature of the market, in this case CRRs, by making such a drastic change to alleviate a symptom that results in unintended consequences without assessing the overall market shortcomings that are causing the symptom of under-collecting CRR revenue, i.e., the fact that the congestion rent paid to CRR holders may be more than collected through the energy market. Why go through the annual allocation and auction followed by quarterly and monthly allocations and auctions, and calculation of daily congestion rents of over 1000 point-to-point transmission node pairs if such a capricious adjustment is needed after the fact that undoes the entire market? What is the point?

In the last Burrito, I explained the difficulty with interconnecting new resources to the CAISO grid. Indeed, all the transmission may or may not be available from the point of interconnection, but the approval process from the CAISO will become increasingly scarce as solar, wind, and battery storage projects flood the pipeline. The CAISO has historically evaluated interconnection requests on a priority basis that was reasonable when the queue was smaller. However, the latest cluster of projects was well over 200,000 MW. The sheer volume of requests not only outstripped the manpower available to consider all combinations and permutations, but the priority had to be tightened up.

Thus, the CAISO proposal that is referred to as Interconnection Process Enhancements (IPE) prioritizes certain projects. It prioritizes projects with executed PPAs or that have been shortlisted in competitive solicitations and deprioritizes projects without PPAs or that have not been shortlisted, i.e., projects that are essentially merchant.

Carrie Bentley is the WPTF CAISO Committee consultant, and she advised her group that deprioritizing merchant projects would mean, “That developers could not seek deliverability until after they were short-listed or under contract. We believe this would unnecessarily increase risk to both LSEs and developers.” Which party wears the risk for attaining interconnection status? The buyer or the seller, or if both, then how? The answer depends on which projects the CAISO is willing to evaluate.

Consider the circular argument that ensues when interconnection evaluation eligibility is constricted: It means more project developers (i.e., sellers and the interconnection requestors) and load serving entities (LSE, i.e., buyers) must perform their solicitation and contracting activities without the CAISO's input, without knowing if the project will ever be eligible to provide RA, before the project has an executed a Generator Interconnection Agreement, and before the project has provided written notice to proceed on network upgrades needed to interconnect the project (meaning the transmission owner construction schedules and achievable commercial operation dates remain in

flux). The project developer is on the hook for hefty queue payments to remain feasible and those outlays can easily become quite risky ... probably entailing more risk than most developers would be willing to swallow. Same for the buying LSE ... how can it know if its procurement portfolio is real or imaginary until the CAISO acts?

Let me switch the discussion and set up the next story by parodying two stanzas of the song “Both Sides Now” written by Joni Mitchell and sung famously in 1968 by Judy Collins:

But now they only block the sun
They rain and snow on everyone
So many models I’d have done
But clouds got in my way

I’ve looked at clouds from both sides now
For climate change and still somehow
It’s clouds’ precision I can’t frame
I really don’t know clouds at all

Ironic as it may seem, a [February 6 WSJ article](#) entitled, “Climate Scientists Encounter Limits of Computer Models, Bedeviling Policy” focuses on exactly that issue. To put it bluntly, the models are becoming more complex, more costly to run, and without any commensurate improvement in accuracy. I mean, how many super computers does it take to unscrew a light bulb? The advanced simulations are up against the complex physics of programming thousands of weather variables such as the extensive impact of clouds. But, you know, that is the basis of the climate debate ... computer modeling. It keeps us gainfully employed.

Your brave leaders depend on these climate models to figure out something, of what I’m never sure. The article stated: “As world leaders consider how to limit greenhouse gases, they depend heavily on what computer climate models predict. But as algorithms and the computer they run on become more powerful—able to crunch far more data and do better simulations—that very complexity has left climate scientists grappling with mismatches among competing computer models.” Are they directionally correct? Most likely. Are the probable bandwidths of outcomes consistent? No. Not yet. Can they back cast historical data with any degree of confidence? The Mesa Laboratory in Boulder at the National Center for Atmospheric Research, or NCAR, attempted to validate some of the climate models and according to the [WSJ article](#), “The NCAR-consortium scientists checked whether the advanced models could reproduce the climate during the last Ice Age, 21,000 years ago, when carbon-dioxide levels and temperatures were much lower than today ... Other new models projected temperatures much colder than the geologic evidence indicated. University of Michigan scientists then tested the new models against the climate 50 million years ago when greenhouse-gas levels and temperatures were much higher than today. The new models projected higher temperatures than evidence suggested.” It’s all in the game of modeling.

Then come the clouds and more modeling thereof. Per the [WSJ](#), “Because clouds can both reflect solar radiation into space and trap heat from Earth’s surface, they are among the biggest challenges for scientists honing climate models.” It further explained that, “By adding far-more-detailed equations to simulate clouds,

What we believe... (cont.)

5. However, when IOUs do the investing, the risks to them are minimal or non-existent because ratepayers cover all of the costs.
- 6) Overcapacity lowers electricity spot market prices; yet retail rates can increase in this case due to full cost-of-service regulation.
- 7) Markets work best when there are many buyers and sellers.
- 8) At-risk money will be put to investment where markets exist that are well regulated and yield credible prices.

the scientists might have introduced small errors that could make their models less accurate than the blunt-force cloud assumptions of older models.” It’s difficult for me to fathom that non-scientists and everyday Joes and Janes know or care about these models. Yet, they are the trigger point for the emotional reaction that people express when discussing climate impacts. That is, until they see the cost of mitigation.

Enough about overcast skies, let’s eat. Here is Chef **Laura Manz** with her recipe for Moo Shu Chicken: “What a wonderful reunion at the WPTF meeting that was held near my home in sunny San Diego. I not only benefitted from reuniting with old friends and lightning-round learning, but I also got some great ideas for future recipes. Meanwhile, we are in Winter Olympics mode, basking in nearly 90-degree heat in SoCal, glued to watching athletes excelling in 5-degree temperatures, and exploring Asian-themed fare. IMHO, while this Moo Shu chicken is best served with mandarin pancakes, it works well with flour tortillas in either lettuce or cabbage wraps.”

... and, what we should do:

1. Believe in ourselves.
2. Encourage creation of independent, multi-state regional transmission organizations that coordinate policies with respective state utility commissions.
3. Support rules for resource adequacy that applies uniformly among all load-serving entities.
4. Enforce competitive solicitations by utilities for purchasing either thermal or renewable power.

In a large bowl, prepare a vegetable medley of 1 cup of destemmed sliced shiitake mushrooms, 3 cups of shredded cabbage, 2 tsp. of minced ginger and 2 cloves of minced garlic.

In a small bowl, whisk together 2 Tbsp. of soy sauce, 2 Tbsp. of hoisin sauce, 1 tsp. of toasted sesame oil, 1 tsp. of honey, and 1 Tbsp. of water. When ingredients are well mixed, whisk in 1 tsp. of cornstarch, and a pinch each of salt and pepper.

Prepare the eggs: heat 1 tsp. of peanut oil in a large skillet over medium heat. Add 2 lightly beaten eggs and season to taste with salt and pepper. Cook without disturbing for about 5 minutes, carefully flipping about halfway through. Remove and cut into strips; keep warm.

Heat 2 tsp. of peanut oil in the same pan. Add 1 pound of chicken, seasoned with salt and pepper, that has been cut into matchstick pieces. Stir and cook for about 5 minutes until browned. Transfer to plate; keep warm.

Add the vegetable medley to the pan and cook for a few minutes until mushrooms are tender. Return the eggs and chicken to the pan. Stir in ¼ cup green onions that have been cut into ½ inch pieces. Add the sauce to the pan and increase heat to medium high. Boil for up to a minute until the sauce starts to thicken. Serve with additional hoisin sauce, sliced green onions on mandarin pancakes (or flour tortillas as an easy option.)

Mandarin pancakes: Pour 2 cups of all-purpose flour in a large bowl, and in a uniform direction slowly stir in ½ cup of boiling water using chopsticks, slowly pour in ½ cup cold water using the same method. When the mixture has slightly cooled, transfer it to a stand mixer and knead for about 8 minutes. Cover with a wet towel and set aside for 30 minutes. Roll the dough onto a floured surface, cut into 20 sections, and roll each into a circle. Brush toasted sesame oil onto the discs, then fry in peanut oil until cooked but still pliable.

Way over the top, girl. Although I love moo-shu style foods they don’t love me. I think it’s the sauce that sets me off. That and Bok choy are my Asian food enemies. But all else works for me. I wonder what Laura will dream up for the closing ceremonies ... something *en flambe* perhaps.

Here is your gum shoe for this week:

>>> Things in the People's Republic of California
@@@ How Many Workshops Does It Take to Fix Resource Adequacy in CA?

>>> Shout Outs

>>> Odds & Ends (!_)

>>> Things in the People's Republic of California
@@@ How Many Workshops Does It Take to Fix Resource Adequacy in CA?

Here is my definition of an unenviable task: explain either to your superiors or clients what ten public CPUC stakeholder-driven workshops have achieved to reform, enhance, improve, revamp, and settle the many debates about resource adequacy (RA) in California. Unfortunately, I am taking on that task today so that you don't have to.

Over the last two years I have introduced the three leading proposals for RA reform as they were hatched and critiqued in their original forms ... SCE (July 2020), PG&E (February 2021), and Gridwell/Vistra (November 2021). Nerds remember but normal people have forgotten all three by now. In fact, when I began today's summary I didn't know what each of those three proposals now looked like after being chewed and digested in large-scale multi-party meetings. Were the results academic or realistic? Has there been any consensus or more of the same intellectual bickering? A draft report summarizing the workshops was just issued and a final report is due at the end of the month. The report covers a lot of territory, but I will limit my discussion below to the main structural overhaul proposals addressed by the workshops.

Let's start with some background. The Commission ordered parties to start the discussion using PG&E's slice-of-day proposal, or SoD. (I have watched all the episodes on Netflix of Last Tango in Halifax which takes place in the UK and the term sod is frequently used but in a rather different way, as in "sod off you wanker.") According to the draft report introduction, "A series of ten online workshops were conducted from October 20, 2021, to January 19, 2022, addressing the following topics as directed in the decision: (1) Structural Elements; (2) Resource Counting; (3) Need Determination and Allocation; (4) Hedging Component; and (5) Unforced Capacity Evaluation (UCAP) and Multi-Year Requirement Proposals." That means many topics were dissected, debated, and in some cases agreed upon. Over 100 on-line participants attended some of the workshops. Try to imagine that.

- ... and, what we should do:**
5. Support choice among retail electricity customers.
 6. Lobby for core/non-core split of retail customers.
 7. Advocate against policies that limit, through bid mitigation, merchant returns on investment that are utility-like returns.

The draft report states that: "PG&E's initial proposal and a new proposal by ... SCE were refined and converged into a proposal for monthly slices of 24 separate hours. Vistra and Gridwell's proposals converged into one for monthly slices based on gross peak and net peak hours only." The remainder of my summary below will focus on the major proposals and attempt to keep the discussion at a high level rather than too much in the weeds. Less info, more understanding.

The PG&E proposal was originally very granular with three seasons, and four slices of a typical day in each season. At present the draft report informs the reader that the PG&E proposal has been amended to a "24-slice approach on a monthly basis." That sounds like an enormous amount of data to compile but on the other hand it gets to the heart of RA ... what capacity is available to the grid operator at any point in time during a typical day? Per the draft report: "If slices are greater than an hour in length or seasons greater than a month, there is a greater likelihood of excess procurement in these multi-hour slices or months." Makes sense.

The SCE proposal jibes with PG&E because it states: “A 24-hourly slices framework avoids over-procurement by effectively addressing challenges related to resource and load variability and eliminates the need to define and regularly update slice and season definitions.” Fair warning to all RA wannabes, trying to cut corners with slices of day and seasons only introduces more complexity and inefficiencies. In fact, if I recall correctly, when the CPUC Energy Division staff held a workshop on new models for RA in November 2019 it was the need for hourly RA evaluation that was eloquently demonstrated. I wrote in the [Friday Memorialize This Burrito](#) (May 21, 2020) that, “In a CPUC workshop held last November regarding new models for resource adequacy ... among the talking points that the staff introduced for future consideration was the possibility of moving from a capacity RA framework to a forward energy RA framework. I think the staff is on the right path with regard to such.” Two-and-one-half years later the apple has not fallen far from that tree. SCE also states that, “[The] 24-hourly slices both supports contracting and permits for reasonable administration. It largely works within the existing RA qualifying capacity (QC) framework without creating new products and requires minimal changes to the existing CAISO processes, including deficiency checks and the backstop process.” This too makes sense.

On the important topic of resource counting for RA compliance, SCE reasons for solar and wind resources that monthly diurnal profiles be used to determine the RA contribution rather than a single-point probabilistic equivalent uniformly applied to all slices (hourly) in a month. Thus, “Solar and wind count based on their expected hourly capacity contribution (hourly profile). Showings will use hourly profiles relative to the assigned Net QC value for the resource.” Battery storage RA is a bit more involved. SCE explains the key parameters to evaluating battery storage for RA. They should be: “Restricted to showing within daily resource capabilities (e.g., maximum daily run hours, maximum continuous energy, and storage efficiency); Multiple cycles possible but must consider downtime for another full charge; Excess capacity must be shown to cover shown battery capacity with efficiency losses.” Storage resources are always difficult to assess for RA purposes and I’m sure the topic will be revisited many times in the future.

As a point of departure, the Gridwell/Vistra proposal uses a monthly two-slice approach ... a gross load requirement and a net-peak assessment. The gross load requirement is like current RA requirements. It would be based on a Planning Reserve Margin derived from a loss-of-load expectation (LOLE) study. Intermittent and energy-limited resources would count towards the requirements based on their Effective Load Carrying Capabilities (ELCCs). In addition, the proposal would involve a separate resource adequacy check at the net peak. For the purposes of this validation, solar would not count because it is subtracted from the gross load to derive the net peak. This approach has much simpler compliance requirements than the 24-slice approach. On the other hand, it potentially involves more extensive upfront modeling to establish ELCCs. Also, because the proposal does not entail formal all-hours capacity requirements, some parties are concerned that the proposal may not assure reliability in all hours, although all hours reliability considerations would be reflected in both the PRM to set the gross load requirement as well as the ELCCs used for resource counting. I think there are definite benefits to this approach, and it seems efficient. However, I sense there will be a lot of momentum to support the PG&E/SCE approach.

In summary, I am pleasantly surprised that as much progress has been made as detailed in the draft report. Consider that the day-long sessions and the number of participants involved meant that thousands of man-hours have been thrown at RA reform in California. But they have promises to keep; And miles to go before they sleep; And miles to go before they sleep.

>>> Shout Outs

Texans are breathing a sigh of relief that last year’s Snowvid-21 did not make a repeat performance this week. Speaking of Texas, my friend Good Ol’ Dave in Houston had a back-and-forth dialogue with the folks at ERCOT that he shared with me. It touched on some of the fundamental questions that I have attempted to address in past Burritos. Dave wrote to me: “I didn't know that ERCOT performed a wind forecast (at no cost

to the wind generators it appears) and likewise, the wind gen folks aren't penalized for not providing common grid support functions such as frequency response. The ancillary services provided by thermal power plants are charged to the load-serving entities, hence to the consumers ... I being one. But the wind developers want more ... they proposed and were awarded a huge transmission buildout from west TX and of course, the consumers are again paying for it.

“How the PUCT bought into this energy only market and all the added benefits to wind generation is a mystery to me?”

“If the Feds provide the Production Tax Credit (PTC) for wind generators, shouldn't the feds have rights to the renewable energy credits (REC) and possibly a carried interest in the energy as a component of that value? For a different perspective, consider the Fed credits for EV purchases.....that credit only applies to the buyer, not to the manufacturer--though the manufacturer is obviously aided by the credit via the benefit to the buyer.

“The present volume (and increasing) of Texas wind and solar energy are burdens to reliable grid operations. Why should they get any special consideration as a form of energy for the grid and why should we allow those energy types diminish the value of all thermal generation--the very generation that fixes the mess that they cause?”

If I can't answer Jim Bushnell's simple questions about largesse to solar rooftop owners and the lack of a monthly connection fee, then how can you expect me to explain away the incentives for wind generation that are renewed by Congress year after year? It isn't even a partisan issue.

Here's a letter from Chris McDarment: “I have spent the past 29 years working in and around electric utilities and look forward to reading the Burrito; glad you're still at it! I've even started forwarding it to my little brother who is stationed overseas, and he has taken to sharing it with the folks he works with on base. So, know your reach and influence is far and broad!

“I have noted before that politicians will often propose big legislation that kicks in (or sunsets) after they have left office but which they can immediately placate their constituents with and pat each other on the back. This, all the while expecting that it will never come to fruition or that it will be some problem for the future that they won't be concerned with or suffer repercussions from. The 'details are for the future' could be their slogan...

“It occurred to me while reading the Burrito that perhaps the 2045 mandate is similar in that politicians who pushed SB 100 through may not have expected for 100% renewable to be reached by 2045 and (eyes closed giving them the benefit of the doubt), maybe they thought passing this legislation would simply move the needle on change. Then again, this may be wishful thinking that they have that self-awareness.

“My only concern is everyone else who isn't familiar with political planning practices and is moving full steam ahead...”

Well, Chris, you bring up a couple of good points. If indeed it comes to pass that SB 100 is a pipe dream that is unaffordable, then its advocates will claim that moving the ball forward was the real aim. You can't deny that as a strategy. The irksome part of it now is that the move afoot in the name of achieving this ridiculous goal has become a Holy Grail. At all costs. Especially if someone else is paying for those costs. Maybe those who voted for SB 100 should have their phone numbers stamped on their butts with the question, “How did it work for you? Call ...”

>>> Odds & Ends (!_)

Long-time Burrito readers will recall the plight of Powhatan Fund and their 12-year struggle with FERC Office of Enforcement. This week the company declared Chapter 7 bankruptcy with the following note written by Kevin Gates: "Powhatan will file for Chapter 7 bankruptcy today, because it does not have enough money to continue to litigate with the FERC over simple spread trades that took place almost 12 years ago. We've already paid our attorneys many millions of dollars and simply do not have another million dollars to continue to defend ourselves from FERC's meritless assault.

"We suspect this will make the FERC happy – they have never sought the pursuit of justice, but rather used the administrative process and the legal system as a cudgel with which to bully us. Even though FERC's investigation began 4,201 days ago, we weren't even able to complete discovery as they threw-up every possible roadblock they could think of to drag this case out and bleed us of resources. Unlike Powhatan, FERC essentially has an unlimited budget, and they are happy to spend 'other people's money' to promote their own agenda. We believe this is FERC's *modus operandi* – the facts, the law and even common decency don't matter to them. They use their power to extract massive, headline-grabbing settlements from people who have no appetite for the exhausting, expensive process of self-defense. Or they bankrupt them. It's almost always just one or the other.

"FERC is part of the reason that citizens are losing faith in our government and a demonstration that bureaucrats sometimes deserve their worst stereotypes."

It's a sad set of circumstances. Some individuals faced with similar charges and accused of market manipulation pursued their cases in District Court and received satisfaction in that the FERC charges were dismissed. But that was after years of litigation and extensive legal costs to the individuals involved. It reinforces the behavior of large firms fighting these battles that enter settlement agreements without admitting any wrongdoing. The pursuit of justice by balance sheet.

You have been patient, and here are your stories for this week:



Hunting in the Rain

Saturday morning, I got up early, put on my long johns, dressed quietly, made my lunch, grabbed my shotgun and the dog, slipped quietly into the garage to load the truck, and proceeded to back out into a torrential downpour.

There was snow mixed with the rain, and the wind was blowing 50 mph. I pulled back into the garage, turned on the radio, and discovered that the weather would be bad throughout the day.

I went back into the house, quietly undressed, and slipped back into bed. There I cuddled up to my wife's back, now with a different anticipation, and whispered, "The weather out there is terrible."

She sleepily replied, "Can you believe my stupid husband is out hunting right now?"

Age Old Jokes

The biggest lie I tell myself is ..."I don't need to write that down, I'll remember it."

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Wouldn't it be great if we could put ourselves in the dryer for ten minutes; come out wrinkle-free and three sizes smaller!

Last year I joined a support group for procrastinators. We haven't met yet!

I don't trip over things; I do random gravity checks!

I don't need anger management. I need people to stop pissing me off!

Old age is coming at a really bad time!

Lord grant me the strength to accept the things I cannot change, the courage to change the things I can & the friends to post my bail when I finally snap!

I don't have gray hair. I have "wisdom highlights". I'm just very wise.

My people skills are just fine. It's my tolerance to idiots that needs work.

If God wanted me to touch my toes, he would've put them on my knees.

The kids text me "plz" which is shorter than please. I text back "no" which is shorter than "yes" .

I'm going to retire and live off of my savings. Not sure what I'll do that second week.

When did it change from "We the people" to "screw the people" ?

Even duct tape can't fix stupid ... but it can muffle the sound!

Why do I have to press one for English when you're just gonna transfer me to someone I can't understand anyway?

Of course I talk to myself, sometimes I need expert advice.

Oops! Did I roll my eyes out loud?

At my age "Getting lucky" means walking into a room and remembering what I came in there for.

Chocolate comes from cocoa which is a tree ... that makes it a plant which means ... chocolate is Salad !!

That's a wrap, boys and girls. We'll do it again next week.

gba