Comments on PRR 986: Update resource adequacy availability incentive mechanism assessment hours

Submitted by:
Martin Blagaich
Southern California Edison
Martin.Blagaich@sce.com
626-302-3302

SCE supports the CAISO's efforts to align the Availability Assessment Hours (AAH) with the evolving grid needs. While supporting the general effort, SCE has some concerns with the process.

SCE is concerned is with the transparency and stakeholder involvement in the development of the new AAH. While the proposed changes seem consistent with the observed changes in grid needs, SCE would like more opportunity for stakeholder review of the methodology and results. SCE appreciates the stakeholder call scheduled for June 6, with this objective in mind. SCE encourages the CAISO to extend the comment deadline on this PRR to a date after the workshop, as to allow for more informed stakeholder feedback.

Furthermore, while the AAH shift to coincide with the Net Peak Load makes sense from an operational perspective, it does raise questions about the meaningfulness and design of current reliability requirements as a whole.