

PRR 1139 - Stakeholder Comments

Submitted by	Company	Date Submitted
Aditya Chauhan aditya.chauhan@sce.com	Southern California Edison	3/6/19

Southern California Edison (SCE) offers the following comments on the California Independent System Operator (CAISO) Proposed Revision Request 1139¹.

SCE does not support the proposed changes

Identification of concerns the CAISO is trying to address with this change

The CAISO has stated that this Nature of Work is only meant for gas-fired resources but has not provided any additional explanation or justification for the change. The “Ambient Not Due to Temp” nature of work (NOW) has been accepted for hydro water management for years and is supported by the tariff. Hydro capacity is contingent on inflows and ambient water levels. The efforts by the CAISO to make changes to this provision have not provided sufficient information about the nature of the issue that the CAISO is attempting to address. Given the historical methodology, entities have already made their annual RA showing for 2019 based upon counting conventions and use-limitation/outage card availability as previously defined. The CAISO proposal is a significant change that will impact entities’ RA showings as well as the use of the available outage cards to manage complex hydro conditions (i.e., the interaction of water availability combined with water uses other than for electric production). Changes at this point will have significant impacts on showings already made and rules already relied upon to make those procurement decisions.

The CAISO should initiate a more complete stakeholder process to clearly identify and address needs

For the reasons above, SCE believes that the CAISO should initiate a stakeholder discussion in order to identify the issues as well as obtain the relevant factors of hydro-electric provision prior to making such significant changes to the outage provisions which have significant impacts on the provision of RA from a specific resource. SCE does not object to ensuring that resources meet the reliability need but SCE does believe that changes of this significance should be done with appropriate transparency and timing sufficient to allow participants to account for such impacts in their procurement efforts.

¹ <https://bpmcm.caiso.com/Pages/ViewPRR.aspx?PRRID=1139&IsDlg=0>

SCE therefore asks that the CAISO suspend this PRR until such time as a complete discussion of the issues, potential solutions, and appropriate timing of such an initiative can be explored.