

PRR 1139 - Stakeholder Comments

Submitted by	Company	Date Submitted
Aditya Chauhan aditya.chauhan@sce.com	Southern California Edison	4/16/19

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

In addition to concerns, outlined below, SCE notes that it is involved in ongoing discussions with the CAISO on how best to represent limitations of non-gas resources, including hydro. The approach taken by the CAISO in this PRR may not be in sync with the CAISO's efforts to resolve the problems in other such engagements.

The CAISO's proposed change to the Ambient Not Due To Temperature Nature of Work Outage runs counter to its tariff section 40.9.3.4(d) 'Exclusions from RAIM for certain Forced Outage types'

The CAISO tariff clearly allows for NOW categories "relating to an administrative action by the resource owner, a cause outside of the control of the resource owner, or a short-term use limitation". The CAISO's proposal in this PRR is counter to its own tariff authority that allows resources RAIM exemption for the above various reasons.

The CAISO has not yet identified the stakeholder initiative that is the source of the proposed change to the Ambient Not Due To Temperature Nature of Work Outage

The proposed deletion of "Non-temperature related unit availability derate that is outside the control of the plant operator." from the defined Purpose of the NOW is a policy decision that precludes a class of resources from being eligible to use such a NOW. The BPM change management framework is not the venue for policy changes. If the CAISO is supporting such a policy decision based on a stakeholder initiative in the policy design space, which is that initiative?

If the CAISO is unable to identify a stakeholder initiative that justifies such a change, it should withdraw its proposed change.

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

