

PRR 1168 - Stakeholder Comments

Submitted by	Company	Date Submitted
Aditya Chauhan aditya.chauhan@sce.com	Southern California Edison	8/1/19

Southern California Edison (SCE) offers the following comments on the California Independent System Operator (CAISO) Proposed Revision Request (PRR) 1168¹.

SCE thanks the CAISO for its stakeholder engagement and its efforts to work toward a viable solution that allows diverse resources to accurately represent the conditions they face.

SCE has a recommendation regarding section 3.4, page 21. The tariff citation to section 40.6.4.1 is extraneous and should be removed. Further, it can lead to confusion. The title of tariff section 40.6.4 explicitly states that it deals with limitations that are not qualified use-limits. Thus, referring to resources with qualified use-limits right after citing the tariff section makes the citation irrelevant and can risk a contradiction. Hence, the proposed language should read:

• ~~Tariff Section 40.6.4.1 Must Offer Obligation~~
Hydro Units without qualifying use limits, Pumping Load without qualifying use limits, Non-Dispatchable Resources without qualifying use limits, and Conditionally-Available Resources (whether or not registered as a Use-Limited Resource) may use this nature of work to notify the CAISO that the resource's expected available energy or expected as-available energy will be below the shown RA Capacity for the unit.

¹ <https://bpmcm.caiso.com/Pages/ViewPRR.aspx?PRRID=1168&IsDlg=0>