

## Stakeholder Comments

### Proposed Revision Request 1254

Submitted by	Organization	Date Submitted
Aditya Chauhan <a href="mailto:aditya.chauhan@sce.com">aditya.chauhan@sce.com</a>	Southern California Edison (SCE)	7/20/2020

#### **SCE proposes the CAISO use publicly available sunrise and sunset data to inform the determination of when solar photovoltaic VERs are allowed to take outages without risking substitution requirements**

SCE proposes the following methodology only for the solar photovoltaic resource technology type. Such technology has clear cut generation start and end times which precludes any exploitation outside clearly defined generation ranges. SCE does not object to any other technology being able to define generation ranges but to SCE's knowledge, no other technology exists with such attributes.

Specifically, SCE proposes that the CAISO use publicly available information to find the times of sunrise and sunset for the most northern Solar Photovoltaic interconnected resource on the CAISO grid (Redding) and most southern Solar Photovoltaic interconnected resource on the CAISO grid (El Centro). Among many publicly available repositories, <https://sunrise-sunset.org/> is one such repository. Using their data, SCE determined that for 2021, there is little or no solar irradiance for these locations for the months and times as follows:

- Jan, Feb, Nov, Dec – after 6:00 P.M.
- Mar, Apr, Sept, Oct – after 8:00 P.M.
- May through Aug – after 9:00 P.M.

Thus, any solar photovoltaic resource should be allowed to take outages after those times (during the relevant month without being required to provide substitution for outage requests that start after the designated times presented).

Below is a graphic of the actual sunset times and the three seasonal limits shown above (including sunrise):

