

SCE Comments – PRR 1441

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Southern California Edison (SCE) provides these Initial comments on the California Independent System Operator's (CAISO) Proposed Revision Request (PRR)1441.¹

SCE requests clarification from the CAISO on the following:

- CAISO should provide more context of this PRR, such as what is the issue the CAISO intends to address and how will the change proposed in the PRR address the issue. The CAISO should also clarify the following:
 - a. Will this PRR apply to solar/wind resources?
 - b. Does this PRR mean the CAISO will restrict the resource's ramp rate (i.e., not exceed 20% of Pmax in a 5-min interval) in its market model while determining a market award?
 - c. Will the ramp rate limitation apply to energy awards only (not applicable to AS award)?
 - d. Is this PRR only applicable during the event when the resource does not have the capability "to follow dispatch instructions by linearly ramping from one DOT to the next"?

¹ <https://bpmcm.caiso.com/Pages/ViewPRR.aspx?PRRID=1441&IsDlg=0>