

Recommendation comments for PRR 1444

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SCE would like to oppose PRR #1444. This PRR could apply a \$500 penalty on each missing data file required for demand response resources. There are three files each day and SCE have approximately 45 resources. The current penalty process for Settlement Quality Meter Data would require a \$1,000 penalty per SC ID per day when meter data is resubmitted. The intent of the \$1,000 penalty is to deter meter data changes that require a full market resettlement unless they are large meter data updates. Two of the three demand response files are not used in settlements, they are only used for audit purposes. In the event that SCE had a failure that resulted in missing our deadline for our SC metered entities, about 65 resources, SCE would pay a penalty of \$1,000. If SCE had a failure that resulted in missing both our CBL and BASE file submittal for a 45 DR resource fleet SCE would face a penalty of \$45,000. SCE thinks that this example of the potential penalty shows that the application of the sanction on each missing file is excessive. The ISO has many tools at its disposal, including audit rights, to ensure proper calculation of the demand response data. SCE opposes PRR #1444 on the basis that the resulting penalties could be excessive, not justified by the impact to the market and could be remedied by other tools already in place at the ISO.