

# SCE Comments – PRR 1465

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Southern California Edison (SCE) provides these Initial comments on the California Independent System Operator's (CAISO) Proposed Revision Request (PRR)1465.<sup>1</sup>

SCE opposes PRR 1465 and the following proposed language to be included in BPM for Demand Response Section 2.1–

PDRs and RDRRs electing to use the five- or fifteen-minute bidding options must ensure their selection complies with tariff section 4.13.3. This section states: “All information provided to the CAISO regarding the operational and technical constraints in the Master File shall be accurate and actually based on physical characteristics of the resources. The ISO may request documentation from resources selecting the five- or fifteen-minute to confirm that their resource has the ability to comply with five- or fifteen-minute dispatches, respectively.”

SCE had raised issues with the current rules and proposed rules for RDRR (see SCE comments to CAISO and FERC on RDRR Bidding Enhancements Phase 2). Specifically, there are two limitations. First, the CAISO market and systems do not recognize the startup time registered in the Master File for RDRR resources when those resources choose 15-minute or 60-minute bidding options. Second, the existing 50 MW discrete cap, as well as the new 100MW cap and the exception criteria, can prevent RDRR resources from being registered as discrete resources when the resource size is above the cap.

The first limitation can result a resource being registered as a 5-minute bidding option, because registering as a 15-minute or 60-minute bidding option would create a mismatch between the resource's true start up time and a hard-coded time used by the CAISO market systems. The second limitation can result in a resource being registered as a continuous resource, even though the resource is discrete in the nature.

Without addressing these two limitations, inserting the above language, that requires RDRR resources selecting the 5 or 15 min options to confirm they are capable of complying with 5 or 15-minute dispatches, is problematic. SCE opposes the proposed language until the CAISO can fix the known issues as stated above. The proposed language assumes that the CAISO market systems would recognize true

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<sup>1</sup> <https://bpmcm.caiso.com/Pages/ViewPRR.aspx?PRRID=1465&IsDlg=0>

parameters in the Master File for RDRR resources, which is simply not the case. For this reason, the CAISO should delete the language as proposed in this PRR.