**SCE’s follow-up comments to BPM PRR 1498**

6/13/2023

As part of PRR 1498, the CAISO published two documents titled "Assistance Energy draft language for WEIM BPM v2 05262023.docx" and "Assistance Energy Transfer BPM Response FINAL.docx". These documents raise concerns about the potential limited supply outside of the WEIM if the CAISO BAA does not opt-in to Assistance Energy Transfer (AET). CAISO emphasizes that AET leverages the real-time market's ability to optimally dispatch all available supply, which may not be accessible in the bilateral market outside of the WEIM. The documents also outline how surcharges will be calculated, based on the lesser amount of RSE failure or actual WEIM transfers, and these surcharges will be determined after-the-fact. In this calculation, supplies such as RDRRs, Strategic Reserves, and Regulation Up will be considered to offset or eliminate surcharges. CAISO also confirms it will not “opt-in” to Assistance Energy Transfers unless there are potential issues seen 8 days before delivery.

SCE has expressed concerns about both cost and reliability. However, the CAISO's proposal and BPM PRR demonstrate the implementation of safeguards to limit exposure to these concerns. For these reasons, SCE does not oppose the opt-in/opt-out criteria for AET and supports the CAISO's use of Assistance Energy as outlined in the BPM and tariff.

Nevertheless, SCE remains uneasy about the relatively untested nature of the process and expects the CAISO to closely monitor its performance to ensure reliability benefits at reasonable costs. If any issues are observed, SCE expects the CAISO to address them promptly, including revising the BPM if necessary.