Southern California Edison's (SCE) Comments on

PRR1641

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Southern California Edison (SCE) appreciates CAISO's efforts to clarify Ancillary Services (AS) certification and testing requirements in the Business Process Manual (BPM) through the Proposed Revision Request (PRR) change management process. SCE offers the following comments and recommendations regarding the new data request language proposed under BPM Section 4.6:

Confirm Resource Owners are Responsible for Data Requests
SCE recommends that any data request initiated by CAISO under BPM Section 4.6 should be directed to the resource owner, not the scheduling coordinator. Resource owners are best positioned to provide accurate information regarding the monitoring and testing of their systems and equipment. This should be clearly written in the BPM.

Standardize Method and Criteria for Initiating Data Requests
SCE continues to suggest that CAISO standardize the method and criteria for initiating data requests. CAISO should clearly state in the BPM that data requests will only be initiated if a resource has not been tested or its ability to provide AS cannot be verified for a specified period. SCE suggests four years. This timeline ensures that data requests are targeted and not unnecessarily frequent, focusing on resources with prolonged gaps in verification.

Clarify and Limit Scope of Data Requests
As mentioned in the AS Focus Group 3 comments, SCE reiterates that the type of information CAISO is seeking is ambiguous, and CAISO should only request data that is not already available through its own systems or market data. If CAISO possesses relevant performance or operational data, even if the performance data did not meet the minimum continuous energy delivery duration for AS, it should use that information as evidence of a resource's ability to provide AS, rather than requesting duplicate data from the generator. If necessary, CAISO should schedule a test to verify availability or recertify a resource.

Minimize Administrative Burden
These recommendations are intended to ensure that the data request process remains efficient and does not create unnecessary administrative burdens for market participants. Targeting data requests to resource owners, limiting requests

to cases where CAISO lacks verification for four years, and avoiding requests for data already in CAISO's possession will help achieve this goal.