

**Southern California Edison's (SCE) Comments on
BPM PRR1661**

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Under section 7.3.1.3.1, CAISO's definition of Long-start resources is inconsistent with how Long-start resources are defined in Tariff Appendix A. CAISO defines Long-start resources in the PRR as:

Long-start resources, defined as those with a minimum downtime exceeding 255 minutes...

However, in Tariff Appendix A, it is defined as:

*A Generating Unit that has a **cycle time** of more than 255 minutes (Start-Up Time plus Minimum Run Time is more than 255 minutes) and requires up to 18 hours to Start-Up and synchronize to the grid.*

SCE also seeks clarity on the "Example" language that CAISO has included in the BPM language. The language says, "A resource with a four-hour minimum run time receives the following day-ahead RUC schedule...". SCE believes that the language should state "A **long-start** resource with a four-hour minimum **down** time receives the following day-ahead RUC schedule...".

Finally, SCE also seeks clarity if the proposed changes will also apply to transition instructions for multi-stage generators (MSG). SCE notes that without the logic applying to MSGs as described in the PRR, the real-time market may dispatch a resource in a way that does not respect a configuration's minimum downtime and could impair the resource's ability to meet its future day-ahead awards.