

Southern California Edison's (SCE) Comments on BPM PRR1663

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#1: NRS RA Import Reassignments, RAAIM

Section 7.4 in the Reliability Requirements BPM states: *If the reassignment request is not accepted by the deadline, the CAISO will not recognize the reassignment, and the resource will be treated as unavailable for RAAIM for all hours that were not covered by reassignment*

CAISO EDAM FAQ states: *A: Yes, if the reassigned resource fails to make themselves available to the Market under the existing must offer requirements, they will be subject to the RAAIM assessment rules.*

SCE has the following clarifying questions from the above:

1) Please clarify if the generator/resource that may be reassigned from the NRS RA Import is supposed to initiate reassignment in CIRA, or the LSE that has the original NRA RA Import? The recently updated CIRA Guide seems to indicate that the generator/resource supplier is the one that needs to initiate reassignments and that "The Resource Reassignment page is only for suppliers".

1a) If the generator/resource is the one that needs to initiate the reassignment and the LSE fails to accept the reassignment, who is responsible for RAAIM?

1b) If the LSE is the one that needs to initiate the reassignment and the generator fails to accept the reassignment, who is responsible for RAAIM?

#2: NRS RA Reassignments, IST-APNs

Additionally, from the Market Instruments BPM at section 3.5.1 for IST APNs, it conveys that these financial type ISTs can *only be submitted at a Trading Hub or a LAP*.

SCE has the following questions related this this and Reassignments between reassigned generators and NRS RA Imports:

2a) In the current pre-EDAM market, NRS RA Imports receive an DA LMP payment at the current SP/Tie they are imported at by the LSE that is importing the NRS RA Import. How could a financial IST APN(s) be utilized along with a Reassignment between the importing LSE and reassigned generators to keep this current import settlement as it is today for the importing LSE, especially considering the current ability to only submit IST APNs at a TH or LAP?