

Proposed Revision Request 1181 - Stakeholder Comments

Submitted by	Company	Date Submitted
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Southern California Edison (SCE) offers the following comments on the California Independent System Operator (CAISO) Proposed Revision Request (PRR) 1181¹.

The CAISO Tariff does not support the CAISO's proposal

Tariff section 4.6.4 reads (emphasis added):

"4.6.4 Identification of Generating Units

Each Participating Generator shall provide data identifying each of its Generating Units and such information regarding the capacity and the operating characteristics of the Generating Unit as may be reasonably requested from time to time by the CAISO. **Each Participating Generator shall provide information on its governor setting** and certify that it has not inhibited the real power response of any Generating Unit by any means that would override the governor response except as necessary to address physical operational constraints for reasons that include ambient temperature limitations, outages of mechanical equipment or regulatory considerations. In the event there is a need to inhibit the real power response of any Generating Unit, the Participating Generators shall provide a written description of this limitation with its certification. All information provided to the CAISO regarding the operational and technical constraints in the Master File must be an accurate reflection of the design capabilities of the resources and its constituent equipment when operating at maximum sustainable performance over Minimum Run Time, recognizing that resource performance may degrade over time. **Information registered in the Master File by a Scheduling Coordinator must also conform** to any additional definitional requirements in Appendix A as may exist as to that information. "

The language does not state that the Scheduling Coordinator (SC) provides design capability information. The language does state that the Participating Generator has this responsibility.

The RDT model design cannot fit the CAISO's expectations

There are Resource Data Template (RDT) model shortcomings which prompt RDT updates as participants learn how the market interprets the data in the RDT model. For example, with Electric Gas Turbines (EGT), the CAISO has conveyed a preference for participants to represent

¹ <https://bpmcm.caiso.com/Pages/ViewPRR.aspx?PRRID=1181&IsDlg=0>

EGTs as Combined Cycle units in the RDT. However, if participants were to do so, they would need to make a subsequent change to the RDT, but there would be no way to describe “how the resource’s design capabilities have changed and how those changes in turn justify changes to the existing data element²”, because no design elements would have changed. The RDT model itself does not provide a way to accurately represent all the design capabilities for this type of resource.

Another example is the STARTS_PER_DAY field in the RDT. There are resources whose capabilities are defined in starts per month. The value in the STARTS_PER_DAY is an approximation and may need to be modified from time to time as a result of the limitations in the model – not because of a design capability change.

The CAISO’s proposal is inefficient

In SCE’s own review of the RDT fields, it found that at least 60% of the attributes should be reported by the Generator, rather than the SC. This brings up two notable problems with the CAISO’s proposal. First, the proposal fails to note that the majority of the attributes would be known to the generator owner, not known to the SC. Second, not all attributes are design features. As noted, about 40% of them are economic. For example, RDRR resources generally participate only in RT but at times also participate in DA. An RDT data value change is required to denote market participation – it is not a change in design capabilities.

Noting these failings in the proposal, SCE finds this to be an appropriate opportunity for the CAISO to correctly assign reporting responsibility in a manner supported by the CAISO tariff.

In contrast, the CAISO’s proposal will result in increased processing time and delays in getting the most accurate information to the CAISO. The primary reason for this is that SCs populate much of the RDT based on contract data. SCs are typically not provided access to technical documentation from the resource owners.

In sum, the CAISO proposal would result, at best, in inaccurate information provided in a delayed time frame, with additional burdens on both CAISO and the SC. Lower quality information at higher cost to all involved is, by definition, inefficient.

² Section B.1 of CAISO proposal. Ibid.