

# SCE Initial comments on PRR 1312

Submitted by: Aditya Chauhan, [aditya.chauhan@sce.com](mailto:aditya.chauhan@sce.com)

## **SCE opposes the proposed changes<sup>1</sup>**

The CAISO's proposed changes are infeasible at several levels.

First, when a VER is producing as capable, its output may be above or below the forecast, and hence DOT. If a resource is already not at a DOP it is unlikely it will ever be able to be at DOP until the very end of the interval.

Example:

DOT: 15 MW

Unit operating as capable at 20 MW

Unit gets OI for 5 MW

Since DOP is calculated based upon DOT this is what DOP would look like:

DOP@minute 1 = 13 MW

DOP@minute 2 = 11 MW

DOP@minute 3 = 9 MW

DOP@minute 4 = 7 MW

DOP@minute 5 = 5 MW

The problem is that resource is operating as capable instead of at DOT, so actual output would look like this:

MW@minute 1 = 17 MW

MW@minute 2 = 14 MW

MW@minute 3 = 11 MW

MW@minute 4 = 8 MW

MW@minute 5 = 5 MW

This illustrates that the resource is unable to follow DOP.

Second, in CIDI ticket #00232054, the CAISO has already instructed SCE to have resources follow immediate ramping across 5 minutes as the operating procedure for RTCD. In contrast, this PRR seems to ask resources to wait until the RTCD interval begins and then ramp over the approximately ten minute duration of the RTCD interval. SCE does not understand which of these two procedures is the

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<sup>1</sup> <https://bpmcm.caiso.com/Pages/ViewPRR.aspx?PRRID=1312&IsDlg=0>

CAISO's requirement. SCE is indifferent toward practice but requires consistency and at least a month for implementation of any changes.

Third, some resources cannot be controlled, as intended, through this PRR. For example, QFs and Run-of-River resources, among others, generate as fuel and host processes allow. Not only should the CAISO clearly specify which resources would be exempt from this PRR but should also address the lack of such clarity in the definition for 'Non-Dispatchable Resource' in the BPM for Definitions and Acronyms<sup>2</sup>.

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<sup>2</sup> Page 82.

[https://bpmcm.aiso.com/BPM%20Document%20Library/Definitions%20and%20Acronyms/BPM\\_for\\_Defintions\\_and\\_Acronyms\\_V18\\_Redline.pdf](https://bpmcm.aiso.com/BPM%20Document%20Library/Definitions%20and%20Acronyms/BPM_for_Defintions_and_Acronyms_V18_Redline.pdf)