

SCE Recommendation comments on PRR 1312¹

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SCE requests clarifications:

a. CIDI vs PRR language:

The CAISO's language in CIDI 232054 specifies ramping in 5 minutes during RTCD whereas the language in PRR 1312 specifies ramping in 10 minutes during RTCD. SCE requests the CAISO clarify which language is correct.

b. CAISO's response to Initial comments²:

1. The CAISO states that a resource should follow its DOP when:

"An Eligible Intermittent Resource, when sufficient fuel (solar irradiance or wind) permits:

- When ramping from producing to its capability, i.e. when its DOT is equal to its forecasted output, to a DOT below its forecasted output pursuant to a negative supplemental Dispatch Instruction.
- When ramping from producing to its capability, i.e. when its DOT is equal to its forecasted output, to a DOT at its forecasted value pursuant to an Operating Instruction not to exceed its DOT.
- When ramping from a DOT lower than its forecasted output to produce to its capability, i.e. when its DOT is equal to its forecasted output.
- When ramping to an output level below the DOT due to insufficient fuel (solar irradiance or wind)."

However, these four cases are precisely when an Eligible Intermittent Resource (EIR) won't follow the DOP. The CAISO should elaborate on why it outlines specifically these four cases given that these are the cases where EIRs cannot follow DOP.

2. The CAISO further states:

"When an Eligible Intermittent Resource is producing as capable, i.e. when its DOT is equal to its forecasted output, the Eligible Intermittent Resource may be producing at a value below or above its forecasted output. Nevertheless, when ramping to a new DOT below its forecasted output, the Eligible Intermittent Resource should still follow a trajectory between Real-Time Dispatch Intervals to reach its new DOT.

Does the CAISO intend this as an exception to the "rules" written above? As written, SCE understands this to be the actual rule, and this may be a more practicable rule. However, SCE cautions that this case does not address when an EIR ramps back up after a curtailment. This

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

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https://bpmcm.caiso.com/Lists/PRR%20Comments/Attachments/1982/PRR1312_Response%20to%20SCE_LSA_NC_PA_Comments_02242021.docx

missing element should be addressed. Finally, there is also another case when a unit will not be able to follow DOP – this is when thermal units shut down. They do not ramp down over a smooth 5 minute trajectory to 0.

3. The CAISO states:

“The CAISO expects that scheduling coordinators would self-schedule the resources SCE identifies. However, the CAISO also expects that these resources would follow any dispatch instructions issued consistent with those self-schedules.”

SCE points out that following a dispatch instruction consistent with self-schedules is not the issue at hand. Instead, the issue is about following dispatch instructions that are not consistent with self-schedules. This can occur when the CAISO curtails self-schedules such as due to extremely low LMPs or when the CAISO Exceptionally Dispatches. While there is an eventual possibility that a unit in this situation may be able to reach the DOT, it will not be able to do so over a 5 minute linear ramp, as this PRR requires.

4. The CAISO provides the exemption:

“Notwithstanding the above, MSS Load following resources may deviate from the Dispatch Instructions in Real-Time to facilitate the following of Load.”

However, the CAISO does not clarify if the following are also exempt –

1. QFs that have not signed a PGA
2. Regulatory Must Take energy
3. Regulatory Must Run
4. Nuclear
5. Run of the River
6. CHP when host processes don't allow
7. Geothermal