

SCE Comments – PRR 1445

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Southern California Edison (SCE) provides these Initial comments on the California Independent System Operator's (CAISO) Proposed Revision Request (PRR)1445.¹

SCE seeks clarifications on the changes. On page 5, “qualifying contractual limitations” were removed as criteria for use limitations. Historically, Proxy Demand Resource (PDR) units have been utilizing these criteria for use limitation qualifications. In section 2.1.15.1.6 the CAISO recognizes that PDR resources are registered as use limited based on contract parameters and the contract is submitted as part of the Use Limit Plan Data Template submission. Without the ability to use “qualifying contractual limitations” as criteria for use limitations, what should PDR units utilize going forward to model their use limitations?

Does the CAISO recognize PDR contract limits as “design considerations” or as “environmental restrictions”? If neither, then with the changes proposed in PRR 1445, PDR resources would not meet criteria 1 for use limitation and would not qualify for use limitations. SCE does not believe this was the intent for PRR 1445 and requests clarification.

In addition, the proposed change is inconsistent with the existing language in CAISO Tariff. Specifically, Section 30.4.6.1.1 includes qualifying contractual limitations as one consideration to qualify for use-limited resources. The CAISO should explain the rationale behind the proposed change and the reason of proposing rules different than CAISO Tariff.

¹ <https://bpmcm.caiso.com/Pages/ViewPRR.aspx?PRRID=1445&IsDlg=0>