SCE Comments – PRR 1471

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Southern California Edison (SCE) provides these Initial comments on the California Independent System Operator's (CAISO) Proposed Revision Request (PRR)1471.[1]

SCE seeks clarifications on the changes.

Aggregate Capability Constraint (ACC)

There are instances when the CAISO expects the ACC to be honored and there are instances when the CAISO will issue dispatches in excess of that limitation. The CAISO should clearly state, within the BPM, when each case applies. Additionally, the CAISO must supply SCs with a realtime flag or status such that the resource can program its control systems to either respect or violate its ACC. This will ensure reliability by minimizing the chance of Scheduling Coordinators misinterpreting any CAISO instructions.

Dynamic Limit Tool (DLT)

In its filing at the FERC[2], the CAISO indicates that dynamic limit submittal is mandatory for every 5 minute interval of every day. The PRR indicates that submitting dynamic limits are optional. Please align the PRR with the proposed tariff.

Additionally, SCE requests clarification on when an outage card is required. The PRR lists four scenarios when a resource may submit dynamic limits. But it isn't clear as to when an outage should be submitted. Consider scenario 2: "unavailability of renewable generation". This vague description suggests that mechanical failure conditions such as inverter failures, loss of source power, or inoperable transformers could properly be reported via the dynamic limit tool because they meet Condition 2 "unavailability of renewable generation". However, it seems like these conditions are more appropriately reported via an outage.   Please clarify when an outage must be submitted.

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[1] https://bpmcm.caiso.com/Pages/ViewPRR.aspx?PRRID=1471&IsDlg=0
[2] http://www.caiso.com/Documents/Sep8-2021-TariffAmendment-HybridRAddesource-Co-locatedResource-ER21-2853.pdf

SCE notes that both these above-mentioned components are key for SCs and the CAISO to interface and clarity is necessary such that both parties can work together to meet grid needs.