

GOP/SC/CAISO/RC Reliability Matrix Comments

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Background

- NERC requires compliance with numerous reliability standards from the Generator Operator
- Many requirements applicable to the Generator Operator require actions be taken by the plant solely to demonstrate compliance
- Compliance with some requirements applicable to the Generator Operator may be best demonstrated through a chain of actions which include the Generator Operator as well as other parties (e.g. Scheduling Coordinator)
 - Example, TOP-002-2 R14 requires notification of real output capability to the Balancing Authority.
 - The plant would be the entity to identify the real output capability
 - However, the current mechanism to inform the CAISO of this change in real output capability is through the scheduling coordinator

Background (cont.)

- Many parties have been working to address this issue individually
- SCE prefers that a CAISO common process be agreed upon by the Generator Operators, Scheduling Coordinators, the CAISO, and the California Mexico Reliability Coordinator
 - As such, SCE has begun work on a document which depicts certain standards for which there is an existing relationship between these entities

Scope of the discussion for today

- The only standards in scope for this discussion are those that implicate the scheduling coordinator relationship with the Generator Operator.
- Review the comments on the communications matrix and the cover letter that have been submitted by stakeholders

Comments Received

- Sterling Energy Management
 - For Constellation Energy
- Cogeneration Association of California and the Energy Producers and Users Coalition
- Calpine Corporation
- Dynegy
- PG&E

General Themes

- Include more on the role of the utility as the Transmission Owner
 - SCE has begun a joint project with the CAISO, PG&E, and SDG&E to identify the requirements which need clarification on which entity is the TO and the TOP
 - End product will likely be a matrix similar in nature to the SC relationship matrix
 - CAISO looking into posting RSA
- Add responsibility to the SC, CAISO, and RC to provide auditable records upon request of WECC
 - Addressed within the cover letter
 - SC agrees to furnish data directly to WECC upon request
- Provide greater detail as to the scope of the role played by the SC
 - SCE and PG&E concur
- Add TOP-001-1 R6 (providing emergency assistance)
 - SCE agrees