

## Stakeholder Comments

### Frequency Response Issue Paper

Submitted by	Company	Date Submitted
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The following are Southern California Edison's (SCE) comments on the California Independent System Operator's (CAISO) August 7, 2015, Issue Paper<sup>1</sup>.

The CAISO paper states that the North America Reliability Corporation (NERC) standard BAL-003-1 entails the measurement of a balancing authority's (BA) MW frequency response (FR) to 25-30 disturbance events. The FR required would be for upward response only. As SCE understands, the CAISO estimates its FR obligation to be 218 MW/0.1Hz. For each of the 25-30 disturbance events, the NERC will divide the CAISO's response in MW by the frequency drop caused by the event, to get a MW/0.1 Hz ratio – the CAISO's actual FR for each event. The events are then ranked in terms of decreasing magnitude of CAISO's actual FR for each event. The median event's MW/0.1 Hz is compared to 218 MW/0.1Hz. If the median rate is less than 218 MW/0.1 Hz, then the CAISO passes the NERC standard for that year.

#### **The CAISO should determine if existing generation meets the requirement of 218 MW/0.1 Hz**

The CAISO should determine, and explain to stakeholders, whether existing synchronous generation has the ability to provide the FR obligation estimated by the CAISO. SCE is not disputing that there is a requirement or that there may be a need. SCE is unable to form a position until the CAISO completes the process of determining need.

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<sup>1</sup> [http://www.caiso.com/Documents/IssuePaper\\_FrequencyResponse.pdf](http://www.caiso.com/Documents/IssuePaper_FrequencyResponse.pdf)