

SCE Comments on Revised Final Proposal on Imbalance Conformance Enhancements

Submitted by	Company	Date Submitted
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Southern California Edison (SCE) provides the following comments on the California Independent System Operator (CAISO) Revised Final on Imbalance Conformance Enhancements (ICE)¹.

The CAISO needs to demonstrate that the upcoming market changes will not adversely impact the market if the limiter is removed in two years

As stated in its prior comments², the proposal to retire the limiter in two years is not justified and inconsistent with how the limiter is used today. The CAISO claims that initiatives such as RTD Market Enhancements, Day Ahead Market Enhancements, Flexible Ramping Product Improvements, will minimize conformance to a level where the limiter will not be needed. If so, the CAISO needs to empirically demonstrate how the specific changes proposed in each of these initiatives will minimize conformance to where the limiter is unnecessary.

¹ http://www.caiso.com/Documents/RevisedDraftFinalProposal-ImbalanceConformanceEnhancements_redline.pdf

² <http://www.caiso.com/Documents/SCEComments-ImbalanceConformanceEnhancements-DraftFinalProposal.pdf>