

Southern California Edison

Stakeholder Comments

RSI 2 Comments

Submitted by	Company	Date Submitted
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SCE appreciates the opportunity to comment on the CAISO's Reliability Services Initiative – Phase 2. At this time, SCE believes the CAISO's proposals are promising but numerous details have not yet been explained to parties. Because of this, SCE's comments focus on understanding the different aspects of each proposal.

Many details surrounding local capacity substitution and replacement rules need to be outlined

SCE does not have any objections at this time to the idea of letting resources located in local areas shown for system or flexible RA, but not shown for local RA, be allowed to provide substitute capacity from a non-local resource. However, there are many implementation details that have not yet been fully explained. For example, on the 11/20/2015 RSI call the CAISO explained that a local resources being used for only system RA could not be used as a substitute resource if and when a local resource went on outage. Details such as this need to be outlined in the proposal itself. SCE requests that the CAISO include replacement and substitution details, and any other changes needed for this local RA change, within the next version of the RSI phase 2 proposal.

RA AIM mitigation measures are needed when Masterfile changes could result in a RA AIM penalty

A mitigation option should be created and/or described for resources who will be subject to RA AIM penalties due to Masterfile changes. During the 11/20/2015 RSI call, the CAISO clarified that resources facing RA AIM due to Masterfile changes will not be able to provide substitute capacity to avoid the penalties (since they are not on outage). Allowing a method for resources to provide some type of resource substitution, however, will benefit all parties. The CAISO will be able to receive new RA resources to meet system needs while the original resource will be able to avoid RA AIM penalties. SCE requests that the CAISO explore methods to allow mitigation measures to this specific case of RA AIM penalties or, if methods already exist, outline how these resources can provide some sort of resource substitution.

The CAISO should provide RA AIM examples for combined resources

In the past, the CAISO has provided detailed examples of how RA AIM penalties would be applied in different situations¹. Given the complexity surrounding resource combinations (including the need to create Pseudo-Resources), SCE believes it would be beneficial for the CAISO to produce similar detailed examples to go over different flexible resource combinations. SCE is interested in two specific cases. First, the scenario where RA AIM penalties need to be split among the resources that make up a pseudo-resource (and how the penalties are split). Second, the implications of combining two use limited resources for flexibility while still having each resource provide their full capacity for system RA².

¹ http://www.caiso.com/Documents/IncentiveCalculationModel_Pmin-outage-uselimitreached-examples.xlsx

² For example, will it be realistic to combine two 100 MW peaking plants with 30 starts per month to form a base ramping resource, while at the same time using these resources to provide 200 MW of system RA?