Southern California Edison (SCE) provides the following appeal on the California Independent System Operator (CAISO) Proposed Revision Request (PRR) 1181\(^1\). SCE does not oppose the CAISO’s intent in ensuring that it obtains accurate and complete data from resources. SCE’s opposition is solely due to the CAISO: (a) asking the wrong entity, the SC, for the data, and, (b) assuming that the RDT model is a sufficient vehicle to deliver the data even though the RDT is unable to include supporting reasons behind data changes.

**SCE strongly opposes the CAISO’s final decision and appeals against it**

In prior comments, SCE detailed the legal, design and operational problems with the CAISO’s proposal. Not only is the CAISO’s proposal in open disagreement with its own tariff section 4.6.4, but it also lacks design judgment in that the RDT cannot deliver what the CAISO proposes\(^2\). Finally, the proposal is also operationally inefficient, with SCE providing a viable alternative after having already investigating the alternative\(^3\).

In response\(^4\) to the legal problem with violating its own tariff, the CAISO responded that its proposal is in-line with a business-as-usual approach. That response does not, whatsoever, address the legal obstacle. In response to the RDT’s inherent construct being unable to deliver on the CAISO’s proposal, the CAISO states that its tariff resolves any such concerns. Such vague responses do not, whatsoever, address the design obstacle.

Finally, the CAISO remains silent on SCE’s proposal, other than the CAISO indicating its unremitting bias toward having SCs manage all CAISO relationships even contrary to the CAISO’s own tariff requirements. Unlike the CAISO’s proposal, SCE’s proposal conforms to the CAISO’s tariff section 4.6.4. Resource owners, knowing their resources better than either the

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1. [https://bpmcm.caiso.com/Pages/ViewPRR.aspx?PRRID=1181&IsDlg=0](https://bpmcm.caiso.com/Pages/ViewPRR.aspx?PRRID=1181&IsDlg=0)
2. In fact, the RDT being the wrong tool for the job would itself result in inaccurate or insufficient data being provided to the CAISO.
3. Under the CAISO’s alternative, SCs would be responsible as middlemen and would likely result in inaccurate or insufficient data being provided to the CAISO.
4. [https://bpmcm.caiso.com/Lists/PRR%20Comments/Attachments/1778/PRR1181_Comment_Response_Matrix.xlsx](https://bpmcm.caiso.com/Lists/PRR%20Comments/Attachments/1778/PRR1181_Comment_Response_Matrix.xlsx)
CAISO or the SC, would report directly to the CAISO rather than using the SC as a completely unnecessary middleman. Five of the six stakeholders that filed Initial Comments recognized that resource owners are the authorities on design knowledge. Yet, the CAISO ignored SCE’s proposal.

The CAISO’s proposal is not valid, let alone feasible.