

SDG&E's Comments on the
CAISO's October 31,2018 Stakeholder Meeting concerning the
CAISO's "*2020 ISO LCR Study Criteria, Methodology, and Assumptions*"

Dispatch of solar photovoltaic generators in year 2020

The dispatch level of solar photovoltaic resources and other generators in the Imperial Valley (IV) and southern and central Arizona areas has a significant impact on the determination of the Greater Imperial Valley SDG&E (GIV-SD) LCR. SDG&E supports the CAISO approach of dispatching all resources up to the latest available NQC and, where applicable, not to exceed historical (projection for new resources) output values at the time of the managed peak load in the local area. Provided that the CAISO approach is also applied to all resources (including resources allocated in neighboring areas) that impact the CAISO's Maximum Import Capability (MIC) and neighboring LCR areas.

SDG&E requests that the CAISO compares LCR results using the new approach of using historical dispatch of resources with LCR results using NQC values based on CPUC's ELCC for the month of August. Running these two scenarios will enable stakeholders and the CAISO to determine if changes to the LCR results are caused by other factor than the generation dispatch at IV.

Use of historical Maximum Import Capability (MIC)

The CAISO should review its practice of setting flows into the CAISO Balancing Authority at historical levels during peak load periods. With the shift of forecast peak load periods into the early evening, it may no longer make sense to set Maximum Import Capability (MIC) at levels which correspond with imports during the time of historical peak imports. Even when peak imports have occurred in the late afternoon because LCR peak loads are not coincident for all areas.

Net Qualifying Capacity (NQC) values need to be posted along with the starting cases

SDG&E would appreciate if CAISO could post resources' NQC that will be used to perform the LCR analysis to make sure that SDG&E study is in line with CAISO's.

LCR final cases

As part of the LCR study process, SDG&E encourages the CAISO to also share the final cases used to determine the final LCR results.

Combined areas LCR optimization process

SDG&E recommends that the CAISO adds more details or a flowchart to the LCR study plan that describes the optimization process used to perform LCR computations of combined areas.