



Stakeholder Comments Template

CAISO RA Workshop: Current Processes and Interoperability with the CPUC's Slice of Day Reform

This template has been created for submission of stakeholder comments on the CAISO RA Workshop: Current Processes and Interoperability with the CPUC's Slice of Day Reform stakeholder call that was held on June 06, 2023. The meeting presentation and meeting recording for this initiative have been posted to the Miscellaneous stakeholder meetings [webpage](#).

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **June 20, 2023**.

Submitted by	Organization	Date Submitted
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Please provide your organization's comments on the following issues and questions.

1. What feedback does your organization have on the CAISO's approach to treat the CPUC's Slice of Day reform 2024 (test year) as informational only?
SCE supports this approach; however, SCE recommends that the information developed and shared by the CPUC from its 2024 test year implementation should be used to test the CAISO systems and the results should be shared in the stakeholder processes.
2. What feedback does your organization have on the CAISO's approach to address compliance for the CPUC's Slice of Day reform in 2025 (implementation year) as a part of the broader Resource Adequacy (RA) Enhancements initiative?
SCE recommends that this process begin as soon as possible so that required changes can be determined by early 2024 and conveyed to the market participants so that they can adjust their RA procurement for 2025.
3. Are there any key risks your organization has identified if the CAISO does not make any changes to the CAISO's RA program and processes for resource adequacy year 2024 or 2025, with respect to the CPUC's Slice of Day reform?
Since 2024 is a test year only, SCE does not see any key risks if the CAISO does not make any changes to its RA program/processes for 2024.

Regarding 2025, the CAISO processes should also function for 2025 despite the changes adopted by the CPUC. SCE believes that the Qualifying Capacity (QC) definitions and load serving entity (LSE) showing amounts will be changing for

some resources. Therefore, it is necessary for the CAISO to first ascertain how the QC will be changing and then determine what the implications of that for CAISO reliability analyses will be. Said differently, even though the expectation is that the CPUC will transfer to the CAISO a single RA value that will function in the CAISO RA processes, the fact that the number that is provided to the CAISO will likely differ from what has previously been provided may have implications for how the CAISO assesses the reliability of the portfolio. In addition, as was pointed out in the workshops, the CAISO validates the LSE showings with the showings by the resources. Thus, both parties must be clear what the new rules are and be submitting the same numbers so that the CAISO's validation may proceed.

It is important that the CAISO process is designed such that when LSEs pass the CPUC 24-hour Slice of Day validation, this also ensures that they will pass the CAISO validation and will not be subject to CAISO backstop for individual RA deficiencies.

SCE also recommends CAISO to clarify substitution criteria for an RA resource on a planned or forced outage. In addition to the current substitution criteria, the 24-hour slice of day mechanism used by the CPUC may suggest additional criteria to be considered for substitute resources.

4. Is there a data analysis approach your organization has developed or analysis your organization recommends the CAISO should develop to analyze the CPUC's Slice of Day reform effort?

SCE suggests that the CAISO should work with the CPUC to understand the CPUC LSE submission spreadsheet and the CPUC validation tools. The analysis embedded in these tools should influence potential changes to how the CAISO evaluates the reliability of the RA fleet and provide guidelines to stakeholders as the CAISO considers modifying its RA process to accommodate the changing resource mix.

5. What topics does your organization recommend the CAISO address in upcoming RA Enhancements working group meetings? Do you have a recommended prioritization?

SCE believes that the workshops should address, at a minimum, the following issues:

- Finalizing the rules for the 2025 RA year
- Discussing how the CAISO's RA process will need to change to accommodate:
 - The changing resources mix, which is the reason behind the CPUC's switch to the Slice of Day
 - A possible issue to be addressed here are the must offer obligations for use-limited resources
 - Any changes required or recommended to accommodate the new reliability products adopted through the DAME initiative

- For example, changes required in the must offer obligations
- Adopting a UCAP mechanism
- Demand Response issues, including how these resources participate in RAIM
- The issue discussed in the CAISO's Deliverability initiative, namely, "Consideration of separating local capacity resources from system capacity resources."

The prioritization should be in the order listed above.

SCE believes that the Resource Adequacy Enhancements initiative has some synergies and interrelationships with the CAISO's separate stakeholder initiatives focused on Interconnection Process Enhancements and Deliverability. The CAISO needs to coordinate the issues discussed in these three stakeholder forums. Ideally, the CAISO will develop a unified, or at least coordinated, approach to these three initiatives and provide stakeholders with a chance to comment on the wholistic approach.

6. For non-CPUC jurisdictional LRAs, are there any changes occurring to your RA program in the next few years that the CAISO should be aware of?
7. Please provide any additional comments you may have on the workshop discussion.