



Stakeholder Comments Template

Pseudo-Ties of Shared Resources

This template has been created for submission of stakeholder comments on the Issue Paper and Straw Proposal, and the associated July 14 meeting discussion, for the Pseudo-Ties of Shared Resources initiative. The paper, stakeholder meeting presentation, and all information related to this initiative is located on the [initiative webpage](#).

Upon completion of this template, please submit it to initiativecomments@caiso.com. **Submissions are requested by close of business July 31, 2020.**

Submitted by	Organization	Date Submitted
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Please provide your organization's general comments on the following issues and answers to specific requests.

1. Metering and Telemetry Requirements

Please provide your organization's feedback on the metering and telemetry requirements, as described within the draft final proposal. Please explain your rationale and include examples if applicable.

SCE has no objections to the use of a Logical Metering Settlement Quality Data Plan inclusive of the meter data reporting requirements for Scheduling Coordinators as represented within the CAISO's draft final proposal in this initiative.

In addition, SCE offers support for the limit imposed for uninstructed deviations allocated to shares of resources delivered to the CAISO BAA. The limit represents a reasonable proxy as the maximum uninstructed deviation possible for the share of the resource whose output is to be delivered to the CAISO BAA.

2. Outage Management and Reporting Requirements

Please provide your organization's feedback on the outage management and reporting requirements, as described within the draft final proposal. Please explain your rationale and include examples if applicable.

SCE supports individual owner responsibility for outage reporting for the share under control by the owner of that share. Although shares are individually scheduled by the respective Scheduling Coordinators but outages and de-rates are proportionally allocated, SCE requests that the CAISO ensures the Shared Resource Allocation Protocol clearly specifies the terms and conditions for the proportional distribution of outages and de-rates for the shared resource. In addition, SCE requests inclusion of the formula for calculating the proportional outage allocation among shares of the resource in the Shared Resource Allocation Protocol.

In the matter of oversight for the Shared Resources Allocation Protocol SCE prefers and recommends that the CAISO provides oversight for the Shared Resource Allocation Protocol. Intermittent auditing for compliance may prove inadequate particularly if clearly specified and transparent rules for telemetry communications, outage management and bid cost recovery between the Sharing Protocol Administrator and the owners of individual shares offer little comfort with the terms and conditions contained in the Shared Resource Allocation Protocol and the individual existing contractual arrangements with which owners of shares are bound by contractual commitments. Should there be a default to self-monitoring for compliance, then the Shared Resource Allocation Protocol must include clauses for dispute resolution which may already exist within the contracts for the individual shares.

3. Treatment of Minimum Load and Start-Up Costs

Please provide your organization's feedback on the proposed treatment of minimum load and start-up costs, as described within the draft final proposal. Please explain your rationale and include examples if applicable.

SCE supports the CAISO's view on treatment of the shared resource's minimum load and start-up costs – specifically where the default is that the “bid cost recovery will apply separately to each pseudo-tied share as a separate resource, based upon each share's resource characteristics and costs, commitment, and bid-in costs”. If there are specific circumstances that warrant a different allocation, they can be submitted to the CAISO in the Shared Resource Allocation Protocol.

4. Additional comments

Please offer any other feedback your organization would like to provide on the issue paper and straw proposal.