



Policy Initiatives Catalog Submission Form

This purpose of this form is to propose potential policy initiatives that require a stakeholder process and typically require tariff changes. Do not use this form to request or propose process improvements or administrative changes. Such requests should be made through your Customer Service Representative or Account Manager.

California ISO Policy Initiatives Catalog Submission Form			
Date: 6/14/2022			
Submitter Information			
Organization	Contact Name	E-mail	Phone
SCE	Rhett Nichol	Rhett.Nichol@sce.com	626 302 3355
Please provide a title for the issue.			
Pay for Performance Accuracy Calculations			
Please provide a summary description of the issue (i.e. 500 words)			
<p>There are fundamental problems with the methodology the CAISO currently uses to evaluate, verify, and dispute the regulation pay for performance accuracy calculations. Neither the BPM nor the proposed PRR take into account how gas-fired generation with spinning mass and inertia cannot respond to the extremely short duration and small quantity reg-up and reg-down dispatches that come when dispatched on AGC by the CAISO to provide Regulation. As a result, generation units like Sentinel will continue to be issued warning notices and be at risk of decertification even after adoption of PRR 1432 because it does not address this mismatch. This is an issue that has been raised by Sentinel and others in prior correspondence but which the CAISO has not attempted to address to date. The CAISO should do so, either by way of a further revision of the BPM or, if need be, by a formal amendment of the tariff.</p>			
Please provide any data/information available that would characterize the importance or magnitude of the issue.			
See comments on PRR 860, 861, 1095, 1210, and 1432 as well as multiple correspondence between CAISO, SCE, and Sentinel.			