

SCE comments on CAISO 2021 Annual Roadmap

Submitted by	Organization	Date Submitted
<i>Aditya Chauhan</i> aditya.chauhan@sce.com	SCE	10/21/2020

Southern California Edison (SCE) reiterates its prior comments¹ regarding the California Independent System Operator's (CAISO) Annual Roadmap².

The CAISO should expedite 'CAISO to Market Participant Relationship Enhancement' item as a stakeholder initiative

This enhancement is based on SCE's historic support for the CAISO obtaining accurate and complete data from resources. In addition, obtaining data directly from parties that have the most accurate information, and insuring parties actually knowledgeable about source information – rather than relying on intermediaries- are responsible and accountable to the CAISO for providing the accurate information better ensures a proper line of accountability. The CAISO's policy in obtaining accurate design capability information reaches back to the Commitment Cost Enhancements 3 Initiative, which obtained Federal Energy Regulatory Commission (FERC) approval on March 28, 2019. SCE had supported the CAISO's policy.

SCE notes that this enhancement would improve the accuracy of the data in the RDT. It also requires no tariff change, as the reporting requirement is already supported by CAISO Tariff section 4.6.43. In its own exploration of the RDT attributes, SCE has determined that approximately 60% of the RDT attributes should be reported by the generator owner. SCE notes that it envisions that both SCs and Participating Generators will continue to be required to submit attributes to the RDT.

SCE acknowledges that the CAISO has a very full slate of policy development topics to work on. SCE believes that this initiative would be very brief as it is a simple matter of determining which RDT element is most appropriately provided by the generator and which is most appropriately provided by the SC. Since these elements generally cleanly separate by which items are physical characteristics of the plant (start times, ramp rates, Pmax, etc) and bidding parameters for the market (start-up costs, minimum load costs, etc.) The task should be relatively simple and thus should not absorb a significant amount of time from the CAISO and stakeholders alike.

¹ <http://www.aiso.com/Documents/SCEComments-2021DraftPolicyInitiativesCatalog.pdf>

² <http://www.aiso.com/Documents/2021DraftPolicyInitiativesRoadmap.pdf> and <http://www.aiso.com/Documents/SCEComments-2021DraftPolicyInitiativesCatalog.pdf>

