

Southern California Edison Company
Comments on the Business Requirements Specification for
Generated Bids and Outage Reporting for Non-Resource
Specific RA Resources

Submitted by	Company	Date Submitted
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Southern California Edison Company (“SCE”) has reviewed the California Independent System Operator’s (“CAISO”) Business Requirements Specification (“BRS”) for Generated Bids and Outage Reporting for Non-Resource Specific Resource Adequacy Resources, dated February 25, 2011 (“NRS RA Resources”) and participated in the stakeholder conference call on March 10, 2011 to discuss the same topic. SCE appreciates this opportunity to provide its input to the CAISO to assist with the implementation of this initiative. SCE has divided its comments into two sections: BRS Comments and Comments on the Template Presentation.

BRS Comments

- **NRS-BRQ012:** Who files the report with FERC?
- **NRS-BRQ016:** How does the CAISO plan to address multiple (mutually exclusive) resource IDs? For example, if an SC were to register 10 IDs which could be used to bring in power and then brings it all in on 4 of those IDs... how will the CAISO know to avoid generating bids on the other 6 IDs? Additionally, would the CAISO extend the bids on the 4 submitted IDs to the full RA amount?
- **NRS-BRQ024:** Will adding all the NRS-RA Resource IDs to SLIC have a negative impact? Is the SLIC replacement capable of handling this as well?
 Note: NRS resources are by definition not resource specific and therefore the ID represents a scheduling ID not a resource ID.
- **NRS-BRQ024 through 26:** These three business requirements seem to imply that bids will be generated in SIBR regardless of outages in SLIC and that the market systems (IFM and HASP/RTM) will use the SLIC data to avoid acting on the generated bids (similar to treatment of generators). However, this is the exact opposite of what was stated on page 10 of the final proposal. SCE prefers the

methodology in the BRS and just wants to confirm that the BRS will supersede the language in the Draft Final Proposal.

- **NRS-BRQ033:** Concerning the “predefined template format” reference in this specification, SCE still has many questions/comments on the template format, which are outlined in the section below entitled “*Comments on the Template Presentation.*”
- **NRS-BRQ041:** Consider rewording this requirement to read “... with an error message which includes enough detail to allow the SC to correct the error causing rejection.” One lesson learned from the Master File GUI (which is very similar in nature) is that the public error messages are not very descriptive and require many phone calls to the CAISO to have the non-public error message conveyed. Before finalizing the error messages please consider if the message is providing enough information for the participant to fix the problem or if they will need to call the CAISO for additional information.
- **NRS-BRQ046:** SCE assumes that only forced outages will count against SCP availability. How will the CAISO handle planned outages entered by the participant? Will this be the same method used for ties which have a zero MW OTC? SCE agrees with the comments made by PowerEx concerning the confusing/conflicting instructions from the CAISO regarding how to handle intertie resources in relation to SCP – especially under zero MW OTC conditions.
- **NRS-BRQ049:** SCE continues to request the CAISO to provide a reason why NRS-RA resources could not be substituted with other NRS-RA if the market participant has obtained the appropriate intertie import rights. (If this requirement is changed it may result in the need to discuss how to generate a bid for non-RA NRS system resources – SCE suggests a default of the price taker option.)
- **NRA-BRQ053:** SCE is a bit unclear if this requirement truly means that all NRS-RA resources will not be including in the grandfathering provisions or only those which were signed after the original grandfathered date? Will the current CAISO approved grandfathered list remain in effect?
- **NRS-BRQ054:** SCE is unclear on how many plans/templates are now being submitted, who is submitting them, when they are due, and who they are being submitted to. Could the CAISO please provide some clarity around this? The current proposal seems to create a number of additional plans that could pose a significant operational burden.
- **NRS-BRQ055 and 56:** What is the visibility of these reports? CAISO? CPUC? FERC? SC? LSE?
- **Table 1 (page 20):** This does not seem to be a complete set of RA contracts. For example, what bucket covers a contract with less than 160 hours on October?

- **Table 2 (page 21):** In relation to the ULR flag column, what does blank mean?
- **Page 23** - The last paragraph is confusing. The CAISO should review this for typos and/or clarity?

Many requirements mention that bids will be generated for HASP/RTM. Under what circumstances will these bids be generated? In particular, if a NRS-RA is not picked up in IFM does it have an obligation to bid into HASP/RTM? If such a resource is picked up for an amount less than full in IFM, does it have the obligation to bid the remainder in HASP/RTM?

Comments on the Template Presentation:

Slide 8: Compliance year and month comments are switched

Slide 9: Where would a phone extension go?

Slide 10:

- Why is the contract number being added to the template?
- Why do we require LSE name on slide 8 and LSE SCID on slide 10. Could these be combined into one field?
- SCE assumes that the CAISO is expecting a row of data for each continuous block of RA capacity. For example, if a resource sold 100MW 7x24 for the month of April then only one line of data would exist with a start and end date of 4/1/2012 and 4/30/2012. However, if the resource only sold 7x16 then there would be 30 rows of data (one for each day) starting each day at HE7 and completing at HE22. Can the CAISO confirm or correct this assumption or provide a sample template with data?
- Will the template use clock time or HE?

Slide 11:

- Why is the contract number being added to the template? What purpose is this intended to serve?
- Does the CAISO expect the Resource Capacity Contract Number to be unique across SCs? How will this be enforced? Why is the Resource/Scheduling ID not sufficient to perform validations?

Slide 12: Does this telephone field allow phone numbers with extensions?

Slide 13: Please further describe the Local Attribute Transfer data element and provide a reference to BPM or Tariff language so we can better understand this.