

Stakeholder Comments Template
CCE Tariff Clarification Proposal

Submitted by	Organization	Date Submitted
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Southern California Edison (SCE) provides the following comments on the California Independent System Operator's (CAISO) Commitment Costs Enhancement Tariff (CCE) Clarification Proposal¹.

SCE notes that this tariff clarification may not be appropriately termed, as it is a distinct policy change and merits a longer stakeholder deliberation. Lack of clarity in the policy and implementation feasibility were among the key issues identified by stakeholders during the call. Stakeholders also underscored the fact that the CAISO may be proposing a limited and rushed solution to a larger problem. SCE urges the CAISO to expand this initiative so that it may appropriately address CCE issues regarding limitations of the existing CAISO fleet.

The CAISO should include resources with legal and regulatory obligations to maintain flows of water, as legitimate use limitations, in the definition for run-of-river hydro. The existing proposed definition only considers resources with physical limitations on water storage, a limitation that does not represent all the restrictions faced by these resources. The CAISO should be mindful that these resources are used for water management and these needs may take priority over electric market participation.

The CAISO should detail the length of time and/or volume of storage that is legitimate to qualify as run-of-river. For example, even hydro systems with some storage capability exhibit the limited dispatch characteristics of run-of-river facilities when rivers between ponds have flow requirements. This example highlights the dependence of capacity with the length of time that it may be stored prior to needing to feed downstream flows or to be lowered to allow for upstream flow. The CAISO should include capacity interplay in any discussion of the appropriate length of time that qualifies as run-of-river.

¹ <http://www.aiso.com/Documents/WhitePaper-CommitmentCostEnhancements-TariffClarification.pdf>
<http://www.aiso.com/Documents/Presentation-CommitmentCostEnhancements-TariffClarification.pdf>