

## Stakeholder Comments Template

### **Subject: Issue Paper and Straw Proposal for Transmission Reliability Margin, December 21, 2011**

Submitted by	Company	Date Submitted
Rich Mettling 626.302.9712 rich.mettling@sce.com	SCE	1/18/12

#### **Introduction**

SCE's first concern is that the clarifications requested below for biasing and inertia applicability be made part of the revised straw proposal. This will enhance the straw proposal and bring TRM into better focus. In addition, SCE believes that the changes in inertia scheduling like dynamic transfer and TRM will benefit from a more predictable curtailment methodology for self-scheduled resources. In fact dynamic transfer and TRM implementations should encourage the CAISO to reexamine that methodology and search for a better solution.

#### **As part of the Final Draft the CAISO should clarify its intent to use TRM on all inerties and speak to the level of TRM expected at each inertia.**

The CAISO proposal focuses on the problem of loop flow at COI. It implies, however, that the TRM tool can be used at all inerties. In the updated proposal the CAISO should clarify whether TRM may be reserved by operators on all inerties how its application is limited to cases where CAISO projections for loop flow, parallel path interactions, and uncertainty in topology are projected threats to reliability.

#### **The CAISO proposal should compare the market efficiency and reliability of operating limits bias versus TRM reductions to scheduling limits.**

TRM and path biasing appear, on the surface, to serve similar purposes. The CAISO should enumerate those similarities and contrast the differences. This clarification will reduce confusion and support the CAISO proposal for TRM. More specifically, the CAISO should examine how TRM might eliminate or reduce biasing in RT and how DA/RT bias might translate into a non-zero TRM. Examples should be used to provide a deeper understanding of how these processes interact and to clarify expectations for TRM.

#### **The question of inertia curtailment priorities should be reopened.**

As proposed, the use of TRM will help to resolve over commitment of inertia capacity in HASP and avoid the resulting curtailments in RT. However, SCE views TRM as a partial solution to the on-going, yet unresolved need for an orderly and predictable inertia curtailment methodology. This is not a new issue but one that may now be considered in light of a more mature MRTU and several changes in inertia processes. SCE asks that the CAISO reexamine the current curtailment method that arbitrarily curtailments a single class of self-schedule while leaving others whole.

#### **Conclusion**

Southern California Edison (SCE) appreciates the opportunity to comment on the CAISO's Transmission Reliability Margin (TRM) and looks forward to further development of this scheduling tool.