

**Stakeholder Comments on:
Resource Adequacy One-for-Many Substitution Draft Final Proposal and
Draft Tariff Language**

| Submitted by | Company | Submitted Date |
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Southern California Edison (SCE) appreciates the efforts by the CAISO to prepare and release the Resource Adequacy One-for-Many Substitution Draft Final Proposal (Dec. 23) and Draft Tariff Language (Dec. 23) with sufficiently time to allow stakeholders to review and provide comments prior to the Jan. 10, 2014 teleconference.

SCE offers the following three comments for discussion/clarification during the Jan. 10, 2014 teleconference.

Draft Final Proposal

I. Introduction

Within this section (3rd paragraph), the proposal states that:

“...the interim manual process will include certain limiting conditions to ensure that the workload is feasible for the ISO to perform [an analysis] on a manual basis without compromising the ability to account for resource adequacy capacity reliably. These [limiting] conditions **may** not apply with the adoption of the automated functionality later in 2014”.

SCE offers that a goal should be for the adopted automation functionality to be sufficiently robust such that any limiting conditions associated with the manual process are eliminated. This would change the word “may” in the above excerpt to “shall”.

IV. ISO’s Manual Process Proposal

- A. Within this section, the proposal mentions that the second substitution resource needs to be pre-registered as well as pre-qualified but the proposal includes no description of what pre-registration involves. Would the CAISO please provide additional information during the Jan. 10 teleconference regarding the anticipated pre-registration process (granularity of data, when and how submitted, criteria for approval, etc.).

B. Within this section (3rd bullet), the proposal states:

“The second substitution **must** be pre-registered with the ISO”,

And language within the Draft Tariff Language (section 6), states:

“The Scheduling Coordinator for a resource providing RA Substitution Capacity **may** pre-register and request approval to provide RA Substitute Capacity for a second Resource Adequacy Resource”.

While SCE recognizes that:

- a) A resource which is to be used as a secondary RA resource “must” be pre-registered by the SC, and
- b) A scheduling Coordinator (SC) is not required to request a secondary RA resource option and therefore the word “may” is applicable as used within this section of the Draft Tariff Language,

SCE is concerned that the use of the term “may” as used within this Tariff section may cause confusion and imply that pre-registration is optional, i.e. a SC may [but is not required to] pre-register a resource to be used as a secondary RA resource.

Would the following language retain the CAISO’ intent:

(6) The Scheduling Coordinator for a resource providing RA Substitute Capacity may ~~pre-register and~~ request approval to provide RA Substitute Capacity for a second Resource Adequacy Resource on a Forced Outage or de-rate through the CAISO’s manual process. The request must be submitted prior to the close of IFM for the subsequent day and the second Resource Adequacy Resource must be pre-registered. The CAISO shall respond to the request and include approved substitutions in CAISO systems within five Business Days. Approved substitutions shall be effective starting on the next Business Day after the CAISO receives the request.

SCE looks forward to participating in the Jan. 10, 2014 teleconference.