Stakeholder Comments – Effective Flexible Capacity Ratings

Submitted by	Company	Date Submitted
Wei Zhou (wei.zhou@sce.com)	Southern California Edison (SCE)	May 28, 2019

SCE appreciates the opportunity to provide comments on the CAISO Effective Flexible Capacity (EFC) Ratings Presentation and Draft Tariff language dated May 14, 2019[1].

1. Issue with the proposed attestation requirement with CIDI ticket submittal

The CAISO has proposed that the Scheduling Coordinator (SC) is required to certify and submit flexible capacity categories for its resources under a CIDI ticket with binding terms. The technical data requested by the CAISO is relevant to physical design attributes of the generator and are known only to the generator owner (GO). The GO is not always the scheduling coordinator (SC). In such a case, the SC has no control over the GO's compliance, with the result that the SC will simply be penalized without any change in data submission compliance[2]. As the CAISO already has a participating generator agreement (PGA) with the GO, the CAISO should directly assign the requirement to the GO. The SC is not party to the PGA and inclusion of the SC in this process is unnecessary. Excluding any impact to the SC will not only guarantee the GO's compliance with data submission but will also maintain consistency with the CAISO policy of keeping contractual dealings independent from uninvolved parties – in this case keeping the SC independent of PGA enforcement between the CAISO and the GO. Compounding on this policy issue, the proposed process only allows SCs to submit the requested information within four business days following the comment deadline[3]; such a short timeline is problematic and not realistic.

For the reasons above, SCE opposes the attestation requirement proposed by the CAISO.

2. Issue with the proposed change in EFC formula for batteries

The CAISO has proposed to incorporate charging efficiency in battery EFC calculation[4]. Specifically, the proposed formula states that EFC is equal to charging efficiency times the minimum output (i.e., -Pmin, which is essentially the maximum withdrawal when charging) plus the net qualifying capacity (NQC). This effectively discounts the EFC value for the battery by the amount of power associated with its charging efficiency.

However, the proposed calculation is incorrect. Even if there is some amount of power lost within a battery during the charging and discharging process, this amount of power helps providing flexibility to the grid and therefore should be counted towards the EFC value. Put it differently, the EFC value should

[1] Presentation, dated May 14, 2019, available at http://www.caiso.com/Documents/Presentation-EffectiveFlexibleCapacityRatingsProcessClarification-May14-2019.pdf
Draft Tariff language, available at http://www.caiso.com/Documents/DraftTariffLanguage-EffectiveFlexibleCapacityRatingsProcessClarification-May14-2019.pdf.
[2] See also https://bpmcm.caiso.com/Lists/PRR%20Comments/Attachments/1568/SCE%20Comments%20on%20PRR%201067.pdf
[3] Presentation, at 29.
[4] Id, at 11.

be calculated based on its contribution to the grid flexibility need – this is measured as an injection or withdrawal from the grid. Therefore, the proposed change is unnecessary.