

Stakeholder Comments on: System Marginal Energy Costs Tariff Revisions

Submitted by (Name and phone number)	Company or Entity	Date Submitted
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SCE supports, in concept, what the CAISO's is trying to achieve in the revised tariff changes to allow for the CAISO to solve the IFM market using a distributed generation bus instead of a distributed load bus under certain conditions. However, SCE request the CAISO provide additional tariff language on how the distribution weighting factors are determined as well as include tariff language requiring the CAISO to provide notification to stakeholders when a distributed generation bus is used to clear the IFM market. Additionally, from a process improvement prospective SCE request the CAISO continue to investigate the root cause of changing from a distributed load to generation model and strive to eliminate the need for this change as soon as possible.

In the case of the distributed load bus SCE request tariff revisions that specify in the Day-Ahead, HASP, and Real-Time markets that the weighting of the load reference bus will be based on the LDF's used in the associated market run. SCE further requests the CAISO describe in its tariff revisions how the LDF's are determined for each market as well as how often each of the associate markets LDF's are updated. In the case of the distributed generation bus SCE requests tariff revisions that specify how the weighting factors are determined (awarded generation capacity, total available generation capacity, remaining available generation capacity after awards, or others) and provide clarification as to whether uncommitted units, including units on outage, are incorporated in the weightings calculation. Lastly, SCE requests tariff revisions that clarify whether (1) the CAISO has the authority to use a distributed generation bus in the HASP and Real-Time market and (2) the CAISO will use a different reference bus model between the Day-Ahead, HASP, and Real-Time markets.