

Stakeholder Comments

Addendum to Temporary Suspension of Resource Operations Final Proposal

Submitted by	Company	Date Submitted
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Southern California Edison (SCE) offers the following addendum to its October 3 submitted comments¹ on the Temporary Suspension of Resource Operations (TSRO) Draft Final Proposal² of the California Independent System Operator (CAISO).

SCE support of the proposal is contingent on a CPM designated resource being compensated based on costs demonstrated at the Federal Energy Regulatory Commission (FERC)

During its review of the final proposal, SCE failed to note that the CAISO does not propose to have a CPM designee demonstrate costs at the FERC, as is the case with the CPM ROR. Instead, it seems a designee will be compensated as bid, regardless of their bid. SCE cannot support the proposal with such a component. Such a compensation again raises the price discovery issue which SCE had noted in its CPM ROR comments, where a designee can compromise the RA process. SCE cannot support a proposal that would allow such price discovery. Instead, SCE believes that the CAISO should utilize the same cost verification by FERC that has been proposed within the CPM ROM mechanism.

¹ <http://www.caiso.com/Documents/SCEComments-TemporaryShutdownofResourceOperations-DraftFinalProposal.pdf>

² <http://www.caiso.com/Documents/DraftFinalProposal-TemporaryShutdownofResourceOperations.pdf>