

Stakeholder Comments

CAISO Generator Contingency & RAS Modeling Draft Final Proposal

Submitted by	Company	Date Submitted
Wei Zhou – (626)302-3273	Southern California Edison (SCE)	7/14/2017

SCE appreciates the opportunity to comment on the California Independent System Operator (CAISO) Generator Contingency & Remedial Action Scheme (RAS) Modeling Draft Final Proposal (Proposal)¹.

As the Proposal largely remains the same as the Revised Straw Proposal², please refer to SCE’s prior comments on this initiative³.

¹Dated June 30, 2017, available at <http://www.caiso.com/Documents/DraftFinalProposal-GeneratorContingencyandRemedialActionSchemeModeling.pdf>

² Dated March 15, 2017, available at <http://www.caiso.com/Documents/RevisedStrawProposal-GeneratorContingencyRemedialActionSchemeModeling.pdf>

³ Dated April 5, 2017, available at http://www.caiso.com/Documents/SCEComments_GeneratorContingencyRemedialActionSchemeModeling_RevisedStrawProposal.pdf, where SCE particularly expresses a concern on the proposal of modeling RAS that can result in RAS units being paid at a higher market price, which can potentially impact the generation interconnection process. SCE also encourages CAISO to explore issues with virtual bidding, esp. when the bid price of a virtual bid at a contingency node can impact the shadow price of the contingency/RAS constraint in day-ahead. SCE does find merits in the proposal of modeling generator contingencies.