

Stakeholder Comments

Participating Intermittent Resource Program (PIRP) Protective Measures 2/24/2017 Meeting

Submitted by	Company	Date Submitted
Aditya Chauhan – (626) 302-3764	Southern California Edison	March 2, 2017

Southern California Edison (SCE) offers the following comments on the 2/24/2017 PIRP Protective Measures Meeting¹ of the California Independent System Operator (CAISO).

SCE opposes continuation of the PIRP subsidy that is paid for by participants who do not have any resources in PIRP

As noted by SCE during the 9/12/2013 Board of Governors meeting², SCE had already resolved any contractual issues of SCE resources, at the request of the Board. Thus, none of SCE's resources have received the PIRP subsidy since Order 764's implementation. Yet, SCE and other market participants continue to be allocated costs that they do not cause. Any existing issues of the 9 remaining PIRP protective measures resources are caused by the scheduling coordinators that contract with these resources. By cost allocation principles, any costs of resulting uplifts that sustain the subsidies should flow to these responsible scheduling coordinators. SCE opposes any continuation of PIRP protective measures.

¹ http://www.caiso.com/Documents/Agenda-Presentation-ParticipatingIntermittentResourcesProgramProtectiveMeasures-Feb24_2017.pdf

² https://www.caiso.com/Documents/Board-GovernorsGeneralSessionMinutesSep12_2013.pdf