

# SCE Comments – Tariff Clarifications

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Southern California Edison (SCE) provides these comments on the California Independent System Operator's (CAISO) Tariff Clarifications<sup>1</sup>. SCE does not support such a severely shortened timeframe approach to addressing market design issues. Such an approach does not encourage stakeholder participation. These proposed changes cover a wide spectrum and SCE has involved diverse teams in reviewing them. It is difficult to properly vet all these changes and provide meaningful comments given the constrained deadline.

## **Intertie Deviation Settlement**

The CAISO proposes to apply enhanced penalty to instances where the E-Tag quantity does not match the accepted ADS quantity. This proposed enhanced penalty to over-deliveries will negatively affect ETC/TOR holders who can increase schedules in Realtime (after HASP and after ADS hourly dispatch). This can result in charge allocation issues between various entities.

## **Changes proposed on page 15<sup>2</sup> onwards**

SCE requests that the CAISO:

1. Explicitly add that it is the “cold” start up time.
2. Provide clarity around which Start up time is used for MSG resources. Startup times are found in the “STARTUP” tab as well as in the “CONFIG\_STRT” tab and they may not necessarily align.
3. Address whether the startup time will come from the “CONFIG\_STRT” tab, and whether CAISO will use the fastest startable config, the slowest startable config, or something else.

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<sup>1</sup> <http://www.caiso.com/Documents/SummaryofIssues-DraftTariffLanguage-TariffClarifications.pdf>

<sup>2</sup> Ibid.