

Stakeholder Comments Template
2019 Tariff Clarifications Filing Process

Submitted by	Organization	Date Submitted
<i>Aditya Chauhan</i> <i>Aditya.Chauhan@sce.com</i>	<i>Southern California Edison (SCE)</i>	12/10/2019

SCE provides the following comments on the California Independent System Operator (CAISO) draft in the 2019 Tariff Clarifications Filing Process¹.

Appendix A-Minimum Dispatchable Level

The minimum dispatchable level is either ~~The greater of~~ (1) the lower limit of the fastest segment of a Generating Unit's Operational Ramp Rate, as adjusted for the Generating Unit's Forbidden Operating Regions, if any, ~~and~~ (2) for Multi-Stage Generating Resources, the minimum MW level of the fastest operational ramp rate across all configurations. ~~if the resource is providing regulation, the lower limit of a Generating Unit's Regulating Range.~~

SCE disagrees with the proposed change since it does not comport with the existing definition, and is a policy change. For instance, how would the CAISO treat a resource that is not a MSG but has a FOR?

¹ <http://www.aiso.com/Documents/Matrix-DraftTariffLanguage-2019Clarifications.pdf>