

Stakeholder Comments Template

Submitted by	Company	Date Submitted
Aditya Chauhan	Southern California Edison (SCE)	10/3/17

Please use this template to provide your written comments on the stakeholder initiative “Temporary Shutdown of Resource Operations.”

Submit comments to InitiativeComments@CAISO.com

Comments are due October 3, 2017 by 5:00pm

The Draft Final Proposal posted on September 6, 2017 and the presentations discussed during the September 13, 2017 stakeholder conference call can be found on the [TSRO Website](#).

Please use this template to provide your written comments on the Draft Final Proposal and any additional comments that you wish to provide.

1. Please indicate whether you support the Draft Final Proposal.

Comments:

[SCE supports the proposal.](#)

2. Please provide any additional comments.

Comments:

[SCE supports the CAISO position that Resource Adequacy \(RA\) crediting should apply for all attributes of a TSRO resource receiving Capacity Procurement Mechanism \(CPM\) payment](#)

[Based on the 9/13 stakeholder call, SCE understands that the CAISO proposes that a Load Serving Entity \(LSE\) paying for the CPM designation will be credited according to the procured](#)

resource's attributes. Thus, if a resource has local or flexible attributes, then the LSE paying the CPM will be credited for all of those attributes. SCE thanks the CAISO for this clarification.

RA crediting should be tradeable

An LSE determines how to optimize its individual portfolio of resources and present specific resources for an RA showing. If an LSE is credited with RA for a resource under the TSRO provision, then the LSE should be allowed to optimize this resource along with the rest of the LSE's portfolio. For example, the LSE may determine no need for the TSRO resource in its RA showing, and therefore the LSE should be allowed to trade the RA credits from TSRO resources to any other entity.