

Stakeholder Comments

2017 Draft Final Policy Roadmap

Submitted by	Company	Date Submitted
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Southern California Edison (SCE) offers the following comments on the 2017 Draft Final Policy Roadmap¹ of the California Independent System Operator (CAISO).

RDT Attribute Reporting Responsibility (RARR) should be prioritized as the highest in the ranking process and immediately begun as a stakeholder process

The CAISO has consistently stated that generator physical attributes should be representative of a generator’s true performance ability and should be reported in the RDT instead of the contractual characteristics. The CAISO has maintained this position within the Commitment Cost Enhancements process and outside of it, reiterating this position to market participants on several occasions. This position has also been echoed by the DMM.

As mentioned in prior comments², the reporting responsibilities of attributes in the RDT can be clearly demarcated between generators and non-generators. Generator physical attributes are information possessed by generator owners rather than scheduling coordinators. Thus, generator owners should be reporting these physical attributes, not scheduling coordinators. By placing the requirement to provide physical attributes of a resource directly upon the generator, the requirement will become a tariff obligation subject to FERC. At present, the requirement is placed upon the SC who can only contractually obligate the generator to providing the information necessary. Placing the obligation directly on the generator with the full force of the tariff is a more appropriate solution. The proposed RARR process would assign these reporting responsibilities accordingly. If the CAISO does desire to obtain accurate physical characteristics

¹ http://www.caiso.com/Documents/DraftFinal_2017PolicyInitiativesRoadmap.pdf

² http://www.caiso.com/Documents/SCEComments_RevisedDraft2017StakeholderInitiativesCatalog.pdf

of a generator, it should immediately begin the RARR as a stakeholder process.