

Stakeholder Comments Template

Subject: Revised Straw Proposal on Multi-Stage Generating Unit Modeling

Submitted by	Company	Date Submitted
<i>Tiff Nelson</i>	<i>San Diego Gas & Electric Co.</i>	<i>4/24/2009</i>

This template has been created for submission of stakeholder comments on the following topics covered in the Revised Straw Proposal regarding Multi-Stage Generating Unit Modeling that was posted on April 13, 2008. Upon completion of this template please submit to GBiedler@caiso.com. Submissions are requested by close of business on April 24, 2009

Please submit your comments to the following questions for each topic in the spaces indicated.

SDG&E Comments on Revised Straw Proposal

SDG&E supports the modified pseudo-plant (configuration-based) approach to modeling multi-stage units.

The key to accurately modeling multi-stage units will be the tables which define the transition from one configuration to another. For example, with the typical 2x1 combined cycle plant the 2x1 operating mode could be a configuration. That configuration can be entered starting from either the 1x1 operating mode or a shutdown condition. While the end-state configuration is identical in each case, the transition (i.e. time to complete transition, start fuel, etc.) can be very different depending on the start point. The design of multi-stage units should accommodate transition to an end-state configuration from more than one starting configurations.

Please clarify what is meant in 5.3. by *“Configurations bid into the real time market for a particular hour can be feasibly transitioned between one another by the 15-minute unit commitment that occurs in real time”*.