

## Stakeholder Comments Template

Submitted by	Company	Date Submitted
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Please use this template to provide your written comments on the stakeholder initiative “Temporary Suspension of Resource Operations.”

Submit comments to [InitiativeComments@CAISO.com](mailto:InitiativeComments@CAISO.com)

**Comments are due May 30, 2017 by 5:00pm**

The Issue Paper posted on May 10, 2017 and the presentations discussed during the May 19, 2017 stakeholder conference call can be found on the [TSRO Website](#).

Please use this template to provide your written comments on the issue paper topics listed below and any additional comments that you wish to provide.

### 1. Scope of Initiative

Please provide any comments on the scope of this initiative.

#### **Comments:**

SDG&E believes the scope should be limited to the process and determination of whether a resource should be granted a TSRO Outage as well as the process of crediting the capacity to LSEs when the TSRO Outage is denied due to reliability needs. The scope should not focus on how much the CAISO or LSEs should pay for such denial since the CAISO has already established the CPM based on annual, monthly and intra-monthly CSPs.

## 2. Identified Issues

Please provide any comments on the issues that have been identified thus far in the initiative, including whether there are other issues that you would like to identify.

### Comments:

An important aspect of this outage is the term so that generators cannot overly utilize this option. SDG&E recommends the minimum length should be six to nine months. An exemption can be provided if the timing of the CAISO's CPM ROR process is able to make its determination in less time. The outage should also not last more than three years consecutive trade years, not rolling years. This three year limit is based on the CAISO's process for resources to keep their deliverability after retirement. The resource should not be allowed to submit for CPM Risk Of Retirement at the end of year three after the CPM ROR deadline passes. This means that the resource must submit for CPM ROR by the deadline in the third year or expect to return to service for year four.

## 3. Other Comments

Please provide any additional comments not associated with the topics listed above.

### Comments:

SDG&E believes that in order for a resource to request for a TSRO outage, it must have offered its capacity into the annual CPM CSP for that trade year. If the CAISO determines that the TSRO outage is denied for reliability, then the resource's offer price in the annual CSP should be used for the entire term of the outage. For each new trade year, the CAISO should reassess the reliability needs of the grid with the resource(s) on TSRO outage to ensure the most needed resource is available for reliability of the grid. This may mean that one resource's outage may be approved for its initial term, years one through three, but the outage is denied for year two based on the study results for year two in year one.

SDG&E looks forward to further discussions on the CAISO's initial proposal.