

Southern California Edison (SCE) Comments on 2021 Policy Initiatives Catalog

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March 20, 2020.

SCE submits the following comments on the California Independent System Operator (CAISO) 2021 Policy Initiatives Catalog¹.

SCE proposes that the CAISO expedite the 'CAISO to Market Participant Relationship Enhancement' item as a stakeholder initiative². This enhancement is based on SCE's historic support for the CAISO obtaining accurate and complete data from resources. In addition, obtaining data directly from parties that have the most accurate information, and insuring parties actually knowledgeable about source information – rather than relying on intermediaries- are responsible and accountable to the CAISO for providing the accurate information better ensures a proper line of accountability.

The CAISO's policy in obtaining accurate design capability information reaches back to the Commitment Cost Enhancements 3 Initiative, which obtained Federal Energy Regulatory Commission (FERC) approval on March 28, 2019. SCE had supported the CAISO's policy. In continuing support, SCE proposes this enhancement, in section 6.1.6, where Resource Data Template (RDT) attributes would be reported both by generator owners and scheduling coordinators. This would enhance the accuracy of the data in the RDT. It also requires no tariff change, as the reporting requirement is already supported by CAISO Tariff section 4.6.4³. In its own exploration of the RDT attributes, SCE has determined that approximately 60% of the RDT attributes should be reported by the generator owner. SCE notes that it envisions that both SCs and Participating Generators will continue to be required to submit attributes to the RDT.

In the Appendix, SCE provides its policy initiatives catalog submission as well as details of its proposal.

¹ <http://www.caiso.com/Documents/Draft2021PolicyInitiativesCatalog.pdf>

² Page 21. Section 6.1.6

³ <http://www.caiso.com/Documents/Conformed-Tariff-asof-Sep28-2019.pdf>

Appendix

SCE submission to Policy Initiatives Catalog

California ISO Policy Initiatives Catalog Submission Form

This purpose of this form is to propose potential policy initiatives that require a stakeholder process and typically require tariff changes. Do not use this form to request or propose process improvements or administrative changes. Such requests should be made through your Customer Service Representative or Account Manager

Date: 8/2/2018

Submitter Information

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Please provide a title for the issue.

CAISO-Market Participant Relationship Enhancement (CMPRE)

Please provide a summary description of the issue (i.e. 500 words)

The CAISO's current system of management of its relationship with market participants does not function appropriately. It can lead to inefficiencies and unnecessary costs, at best, and unattainability of the CAISO's goals, at worst. In each case, the CAISO should accurately identify the right party with whom it has a specific need and directly engage that party. Instead, the CAISO relies, heavily and inappropriately, on the wrong party as a middleman. In particular, the use of the Scheduling Coordinator (SC) to provide information that the SC does not necessarily need for its contractual relationship with the resource owner but the CAISO may need for reliable operation. The proposed CMPRE initiative should streamline the CAISO's dealings with participants by implementing direct dealings between the CAISO and the appropriate parties that should provide information and/or response to the CAISO.

For example, while the CAISO has Participating Generator Agreements with resources, it does not rely on its relationship with the generator to meet many of the CAISOs needs. In the dimension of RDT data accuracy, the CAISO relies on Scheduling Coordinators to provide even physical attributes on a resource. The generator is best positioned to provide the CAISO with physical attributes of the resource and not the SC. Continuing to rely on SCs to provide information, that if incorrect is ultimately the responsibility of the generator, places the SC in an unnecessary intermediary role. This can lead to inefficiencies and costs due to the CAISO using unreliable data because it preferred that the SC provide data when in fact the resource owner should have done so. Such inefficiencies can lead to damaging costs in the markets from incorrect resource commitment and dispatch.

Another example of mismanagement of relationships is in the recent PRR 1067. Here, the CAISO expects resource compliance on data requests. However, any non-compliance will lead to the CAISO penalizing the SC, not the resource owner. The result is that a resource can continue to ignore the CAISO and the SC, since the latter lacks any legal authority to penalize it over a data request from the CAISO, and the former is unwilling to utilize its existing PGA relationship with the resource owner to directly obtain the information. In this case, the CAISO can end up with no data at all, while the SC keeps getting penalized with \$500/day costs. Within this PRR, the CAISO has recognized that if the SC is unable to obtain the information from the generator, the CAISO can penalize the generator directly. This should be the standard rather than the exception.

In sum, the CAISO’s existing approach must be rectified to prevent not only inefficiencies, but also prevent distortions in the market due to lack of a direct approach.

Please provide any data/information available that would characterize the importance or magnitude of the issue.

SCE analysis of RDT reporting responsibilities

SC = SC, G = Gen, C = CAISO						
Attribute	Reporting responsibility			Proportion		
Participating Generator Agreement Name	G			SC	22	24.72%
Scheduling Coordinator ID	SC			Gen	54	60.67%
Resource ID	G			CAISO	9	10.11%
Resource Name	G			N/A	4	4.49%

Resource Type	G				Total	89	
Aggregate?	SC						
Energy Type	G						
Primary Fuel Type	G						
Prime Mover Technology	G						
Generator Type	G						
Fuel Region	SC						
Air Quality Management District	G						
Maximum Generation Capacity	G						
Minimum Generation Capacity	G						
Minimum Dispatchable Level	G						
Minimum On Time	G						
Maximum Daily On Time	N/A						
Minimum Off Time	G						
Maximum Startups Per Day	G						
Minimum Load Cost	G						
Minimum Load Cost Basis	SC						
Startup Cost Basis	SC						
Maximum Pump Capacity	G						
Pumping Minimum Cost	G						
Pumping Factor	G						
Pump Maximum Daily Startups	G						
Pump Minimum Up Time	G						
Pump Minimum Down Time	G						
Gen-to-Pump Minimum Down Time	G						
Pump-to-Gen Minimum Down Time	G						
Pump Maximum Shutdown Cost	SC						
Pump Shutdown Time	G						
Variable Cost Option	SC						
Negotiated Rate Option	SC						
LMP Option	SC						
Reserve Capacity: Spin	G						
Reserve Capacity: Non-Spin	G						
Certified PIRP	SC						
Must Offer Obligation Flag	C						
Must Offer Obligation Qualified	C						
Startup Code Type	G						
Participating Generator Agreement Flag	G						
Constrained Output Generator Flag	G						
Certified for Black Start	G						
Certified for DA Market	G						

Certified for RT Market	G					
Certified for RUC	G					
Market Power Mitigation Participation Flag	C					
Certified for AS: Regulation Down	G					
Certified for AS: Regulation Up	G					
Certified for AS: Spin	G					
Certified for AS DAM: Non-Spin	G					
Certified for AS RTM: Non-Spin	G					
MSS Load Following Down	N/A					
MSS Load Following Up	N/A					
FERC Qualifying Facility Flag	G					
Use Limit	G					
Operating Maintenance Cost	C					
Priority Type	C					
Dispatchable	G					
Discrete Dispatch	SC					
RMR	G					
Maximum Ramp Rate	G					
Price Setter - DAM	C					
Price Setter - RTM	C					
Multi Stage Generator Flag	SC					
Startup Ramp Time	G					
Supplied Configuration Flag	N/A					
Hourly Pre-Dispatch	SC					
Stranded Load	C					
Non Generator Resource	SC					
Regulation Energy Management	SC					
Minimum Continuous Energy Limit	G					
Maximum Continuous Energy Limit	G					
Curtailment Energy Limit	G					
Energy Efficiency	G					
Combined Heat and Power Resource	G					
RMT Max On Peak	SC					
RMT On Peak Expiration Date	SC					
RMT Max Off Peak	SC					
RMT Off Peak Expiration Date	SC					
Green House Gas Emission Rate	G					
Green House Gas Compliance Obligation	SC					
Green House Gas Cost - For EIM Only	G					
Minimum Load Major Maintenance Adder	G					
Variable Energy Resource Flag	G					

Forecast Selection	SC					
Energy Imbalance Market Participating Flag	SC					
Balancing Authority Area	C					