

SCE Comments – Adjustment to Intertie Constraint Penalty Prices

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Southern California Edison (SCE) provides these comments on the California Independent System Operator's (CAISO) Straw Proposal on Adjustment to Intertie Constraint Penalty Prices.¹

SCE strongly supports the CAISO's authority and ability to maintain scheduling priority. To this end, the CAISO should have available any tools necessary to meet reliability needs. Grid reliability should take precedence over market issues.

While SCE also appreciates the CAISO's solution specific to the proposed prices. To better understand potential effects of the CAISO proposal, SCE suggests that the CAISO should present sensitivity analysis with the newly proposed penalty prices for July 9, 2021 and August 19, 2020. The analysis could show the cleared supply quantity (granularity of schedule type) and LMPs. This should help stakeholders determine the appropriateness of the proposed penalty prices.

¹ <http://www.caiso.com/informed/Pages/MeetingsEvents/MiscellaneousStakeholderMeetings/Default.aspx>