Stakeholder Comments Template

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Southern California Edison (SCE) appreciates the CAISO considering revisions to the deliverability study assumptions used in the existing methodology, as the CAISO-controlled grid continues to experience an increasing number of interconnecting intermittent resources. SCE supports the proposed changes contained in the CAISO's Deliverability Assessment Methodology Revisions Draft Final Proposal posted on September 27, 2019 and recommends that such proposed revisions be implemented as soon as possible. However, there are two related areas where SCE would like the CAISO to provide clarification regarding its proposal before it is presented to the CAISO Board for approval:

1.) SCE understands the CAISO's objective of evaluating intermittent resources under three different assumptions – High System Need, Secondary System Need, and Off-Peak Deliverability – to account for the increasing contribution of these resource towards resource adequacy. The proposed deliverability assessment would be in alignment with the CPUC's effective load carrying capacity (ELCC) approach to calibrate for the varying levels of output of intermittent resources during different time periods. Given that ELCC is a loss of load probability, is system reliability negatively impacted when all the resources are not providing their respective full MW production levels in the hours where they are capable of doing so? SCE understands the ELCC to be a method of loss of load probability and that while the ELCC arrives at a value coincident with the most binding case, there are other cases of potential loss of load for which the resource is expected to produce at a higher output including up to full installed capacity. If multiple resources are allowed to interconnect at their ELCC fully utilizing the interconnection capability, then their full capacity output would not be feasible and the other loss of load incidences that were only met by full capacity output would not be met. SCE asks the CAISO to more completely explain how the use of a High System Need, Secondary System Need, and Off-Peak Deliverability fully addresses the RA reliability need and ELCC methodology.

2.) Developers frequently seek Full Capacity Deliverability Status (FCDS) for more than Resource Adequacy purposes. For example, a Load Serving Entity (LSE) relying on a resource to meet its RPS needs has a level of certainty of expected output under FCDS that it would not have if the FCDS only includes the level of output up to its ELCC. The market will need to better understand how to value the output of such a resource with regard to meeting the LSE's RPS needs. What information regarding multiple uses of the same impacted interconnection facilities does the CAISO propose to make publically available to allow LSEs to more properly value such resources when the service(s) they seek to provide go beyond Resource Adequacy, and are impacted by their deliverability status? If an entity interconnects at a point in time, will later interconnections be able to reduce the amount of deliverability of the previously interconnected resource? If so, by how much? As an alternative, will the CAISO offer deliverability on a separate basis to ensure a resource's output is deliverable 100% all of the time?