

Stakeholder Comments – Local Capacity Technical Study Criteria Update

Submitted by	Company	Date Submitted
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SCE appreciates the opportunity to provide comments on the CAISO Updates to the Local Capacity Technical (LCT) Criteria Issue Paper dated May 23, 2019¹.

There should be a discussion on aligning the location of outages and location of identified problem for defining local area need. SCE also proposes that, to help improve the transparency and clarity of the LCT studies, the CAISO should provide the list of the next critical contingencies and amount of resource needs for large local areas (e.g. LA basin) in future LCT studies. This is important because when an issue is fixed and the contingency addressed for one area, it might affect the local requirements for neighboring areas if there is an inter-relationship. For example, in the last several LCT studies, SCE has observed that the CAISO used outages in non-SCE areas and resulting overloaded lines in those areas (e.g. San Diego) to define local requirements for SCE LA Basin. Without this information, it's difficult to evaluate the resulting impacts on local requirements for the local area even if the issue being fixed belongs to a different area.

In addition, in the instance when outages in non-SCE areas (e.g. San Diego) impact the local requirements for SCE LA Basin, the CAISO should provide that information and quantify the impact (in MWs) due to those outages in non-SCE areas in the LCT studies.

¹ Presentation, dated May 14, 2019, available at <http://www.caiso.com/Documents/IssuePaper-LocalCapacityTechnicalStudyCriteriaUpdate.pdf>