California ISO

Stakeholder Comments Template

Pseudo-Ties of Shared Resources

This template has been created for submission of stakeholder comments on the Issue Paper and Straw Proposal, and the associated May 14 meeting discussion, for the Pseudo-Ties of Shared Resources initiative. The paper, stakeholder meeting presentation, and all information related to this initiative is located on the initiative webpage.

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business **May 29, 2020**.

Submitted by	Organization	Date Submitted
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Please provide your organization's general comments on the following issues and answers to specific requests.

1. **Metering and Telemetry Requirements**

    Please provide your organization's feedback on the metering and telemetry requirements, as described within the issue paper and straw proposal. Please explain your rationale and include examples if applicable.

    SCE asks for clarification on whether the host EIM entity or the Sharing Protocol Administrator will have responsibility for reporting the hourly production of the individual shares to facilitate interchange accounting. SCE offers no comments on metering settlement protocols for shared resources.

    SCE expects that the metering data quality standards currently enforced within the CAISO Tariff shall continue to apply to shared resources that are pseudo-tied. Further, any logical metering procedure adopted by the Sharing Protocol Administrator should be documented within the relevant CAISO Business Practice Manual.

2. **Outage Management and Reporting Requirements**

    Please provide your organization's feedback on the outage management and reporting requirements, as described within the issue paper and straw proposal. Please explain your rationale and include examples if applicable.

SCE seeks clarification whether individual Scheduling Coordinators are responsible for outage management and reporting for their share of the resource rather than the Sharing Protocol Administrator executing this responsibility on behalf of the Scheduling Coordinators. In particular, SCE would like further clarification on how outage coordination and management will be conducted when multiple shares of the shared resource have resource adequacy and non-resource adequacy obligations in the CAISO market for which the net qualifying capacity of the resource does not bear a one to one correspondence.

SCE recommends that the terms and conditions of the Shared Resource Allocation Protocol and the responsibilities of the Sharing Protocol Administrator be established prior to any assignment of responsibility for outage management and reporting. Further, If there are any allocation measures to be applied in a specific manner in relation to outage management and coordination and uninstructed deviations, those measures as well as any auditing procedures for any of the processes should be specified within the Shared Resource Allocation Protocol.

3. **Treatment of Minimum Load and Start-Up Costs**

   Please provide your organization's feedback on the proposed treatment of minimum load and start-up costs, as described within the issue paper and straw proposal. Please explain your rationale and include examples if applicable.

   SCE supports the proposal to use pseudo-ties for shared resources for which a portion of the resource's output will be delivered to the CAISO BAA and the native load within an EIM BAA for which the resource owner has a commitment to serve.

   However, SCE asks for additional details on modeling each share of the resource as a simple generator with start-up (SUC) and minimum load costs (MLC). Is the CAISO's proposal recommending that the shares be modelled independently or jointly? That is, will the relationship between the shares and the simple generator be one share to one generator or many shares to a single generator. How does the CAISO propose to monitor consistency of SUC and MLC determination? For example, if a resource is Use Limited, it can elect either the Proxy Cost or Registered Cost methodology. With multiple SCs for the shared resource, different elections can be made. Further, will the CAISO ensure that other details relevant to the commitment cost calculations, such as PMin, are consistent in the provided Resource Data Templates (RDT)? The CAISO should provide all details on commitment cost determination, in addition to addressing the above questions.

   SCE has concerns with separate Scheduling Coordinators reporting minimum load and start-up costs for the individual shares of the resource operating under different resource IDs corresponding to the individual shares. If different resource IDs must be used to represent the individual shares, then either the CAISO or the Sharing Protocol Administrator should have responsibility for aggregating the costs and schedules for the shares.

   The Sharing Protocol Administrator should be an independent third-party with no vested market or asset interest for any of the shared resources governed by the Shared Resource Allocation Protocol. Negative experiences with rotating the lead scheduling party for shared resources have been recorded in the markets administered by the New York ISO

and ISO New England for which legal action was taken due to observed scheduling information coordination.

Finally, SCE supports the designation of a Sharing Protocol Administrator as the aggregator of the schedules for the shared resource in the event that multiple Scheduling Coordinators are used. That designee as the Sharing Protocol Administrator should be decided by the holders of shares in the resource and reported to the CAISO. Further, SCE requests that any change of the designated Sharing Protocol Administrator or Scheduling Coordinator should not be driven by changes in the size of the share held by individual owners.

4. **Additional comments**

Please offer any other feedback your organization would like to provide on the issue paper and straw proposal.