

Stakeholder Comments Template

Submitted by	Company	Date Submitted
<p><i>Tony Velarde</i> <i>antonio.velarde@sce.com</i></p> <p><i>Fernando E. Cornejo</i> <i>fernando.cornejo@sce.com</i></p>	<p><i>Southern California Edison</i></p>	<p><i>August 16, 2019</i></p>

Southern California Edison (SCE) appreciates the CAISO considering revisions to the deliverability study assumptions used in the existing methodology, given the significant changes in the composition of the existing generation fleet since the CAISO’s previous modifications in 2009 and the further changes anticipated over the forecast horizon. SCE supports the proposed changes contained in the CAISO’s Deliverability Assessment Methodology Revisions Straw Proposal posted on July 29, 2019 and recommends that such proposed revisions be implemented as soon as possible and applied immediately to the resources in the existing interconnection queue.

The proposed revisions are needed to align the deliverability studies to the resource capacity needed for the identified critical periods:

- a) Highest system need scenario, during the summer hours ending 18 to 22 when capacity shortage is most likely to occur;
- b) Secondary system need scenario, during the summer hours ending 15 to 17 when the capacity shortage risk will increase if the intermittent generation is not deliverable while producing at a significant output level; and
- c) An additional Off-peak deliverability assessment (not under oversupply conditions) to address curtailment of renewable resources due to transmission constraints.

SCE recommends that any refinements to the revised deliverability assessment methodology in response to concerns of resource developers regarding curtailments could be reviewed after the revisions have been implemented in the next studies and specific issues have been identified.