

Southern California Edison Stakeholder Comments

BPA Stakeholder Discussion Meeting on EIM Implementation held October 28, 2013

Submitted by	Company	Date Submitted
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The following are Southern California Edison's (SCE) comments on BPA's stakeholder meeting and presentation material held on October 28, 2013¹.

SCE appreciates BPA engaging impacted parties for feedback on the proposed implementation procedures under consideration by BPA.

SCE comments on the following issues:

- The inclusion of BPA's transmission constraints in the EIM optimization will have impacts on the CAISO pricing, dispatch, and uplifts
- Please provide more information of the use of BPA's transmission system by PacifiCorp for their balancing authority area functions

Lack of comments on specific issues here does not constitute endorsement of other aspects of BPA's implementation proposal.

1. The inclusion of BPA's transmission constraints in the EIM optimization will have impacts on the CAISO pricing, dispatch, and uplifts

The presentation, and during the meeting, BPA identified three constraints that must be adhered to in order to allow the Energy Imbalance Market (EIM) proposal to utilize BPA transmission system. The three constraints are:

- Restrictions at 11 flowgates on BPA's system
- Maximum 5 minute changes (5 minute delta) to scheduled power flow

¹ <http://www.bpa.gov/transmission/CustomerInvolvement/Energy-Imbalance-Market/Documents/CAISO-EIM-Stakeholder-102813.pdf>

- Issues related to remedial action scheme (RAS)

BPA expressed that these constraints should be included in the CAISO EIM optimization software. When the constraints become binding, the optimization will attempt to resolve the constraint by changing the dispatch of the units which creates additional costs. However, if the constraint was due to a BPA requirement, and was not within PacifiCorp's balancing authority, it would create costs that would normally be charged to BPA. However, since BPA is not an EIM participant, the CAISO proposal will have to ensure the costs flow to other EIM entities.

While BPA is justified for requesting EIM does not impact the reliability of their system, BPA will have to work with the CAISO, PacifiCorp and other impacted stakeholders to ensure the requests are reasonable, do not result in unnecessary market distortions, and costs are appropriately allocated.

2. Please provide more information of the use of BPA's transmission system by PacifiCorp for their balancing authority area functions

Unlike California, where balancing area authorities (BAA) are contiguous, PacifiCorp's BAA is not contiguous and is located in multiple areas within BPA. SCE has the following questions and clarifications:

- Please provide addition information of the current coordination and restrictions that BPA requires of PacifiCorp to utilize dynamic transfers on BPA's transmission system.
 - Are the flow gates restrictions part of PacifiCorp's transmission rights on BPA system or are these associated with BPA's overall grid operations?
 - Please provide additional details on the flow gates of concern including details on the lines impacted, and PacifiCorps rights on these lines.
 - Please provide details on any flow gates they want modeled in the EIM for which PacifiCorp does not have transmission rights.
- Please provide details on PacifiCorps "network rights" within BPA.
- Please provide more details on BPA's role in operating the COI, including any contractual obligations that would limit EIM usage of the COI.

- Please describe any data exchange (such as day-ahead operating plans, real-time unit meter output, and real-time transmission flows) it plans to provide to the CAISO as part of the EIM.