



EDAM Net Export Transfer Constraint

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SCE appreciates the CAISO developing the EDAM Net Export Transfer Constraint

- SCE believes the Net Export Transfer Constraint addresses the following:
 - Ensures that a portion of a BAA's internal generation is reserved to respond to reliability events
 - Ensures there is enough supply to respond to contingency events
 - Allows the CAISO BAA to avoid costs and potential reliability issues for firming non-RSE imports into EDAM transfers
 - Puts CAISO BAA into similar position with respect to other EDAM BAAs
 - Helps address the asymmetry that CA has a RA must-offer while other BAA's don't have RA/RA must-offer
- SCE understands the benefits to the market of increased supply from imports, however California ratepayers shouldn't incur additional costs or reduced reliability for providing this benefit to other BAAs
- SCE believes its proposal allows for the increased market benefits, while limiting the potential costs and reliability issues incurred by California ratepayers

SCE Proposal

- SCE recommends that the CAISO calculate separate confidence factors for stressed and non-stressed days
 - For non-stressed days, historical data specific to non-stressed conditions should be used
 - For stressed day, the confidence factor should be set at a very low level (<20%)
- Stressed conditions if any of the following apply
 - EEA Watch, Warning or Emergency
 - Restricted Maintenance Operations
 - Transmission Emergency
 - Flex Alert
 - If the CAISO opts into assistance energy, or if 8-day look-ahead period shows a shortage
 - Potential additional criteria, as determined through a stakeholder process
 - 2-day ahead RUC results
 - If forecast excess RA falls below some threshold (e.g., 1,000MW)

Thank you

Questions?