

Stakeholder Comments

Contingency Modeling Enhancements, Third Revised Straw Proposal Issued November 20, 2015

Submitted by	Company	Date Submitted
Lisa Olson eolson@semprautilities.com 858-650-6182	San Diego Gas & Electric	December 22, 2015

SDG&E appreciates the opportunity to comment on the Contingency Modeling Enhancements (CME) Third Revised Straw Proposal and stakeholder meeting. SDG&E supports CAISO's persistence in scoping methods to reduce contingencies triggering Exceptional Dispatches (ED) and minimum online capacity (MOC) constraints. SDG&E encourages the CAISO to be detailed and careful in considering methods to reduce contingency triggers, diligently reviewing costs and impacts.

SDG&E looks forward to detailed data promised by the CAISO as a part of the stakeholder process as well as a workshop to evaluate the proposed method and resulting data. This will be a valuable way to measure proposed enhancement impacts and see if there are any unintended results.

SDG&E also requests a more robust discussion on the interaction of Convergence Bids (CBs) and the proposal. SDG&E appreciates the effort for consistency across markets. But, it would be helpful if the CAISO demonstrate that CBs eligible for the locational marginal capacity price (LMCP) do not cause problems elsewhere. SDG&E recommends the CAISO explore this further and share findings in the next straw proposal and workshop. It is important to ensure CBs with corrective capacity awards do not result in unintended consequences elsewhere.