

DOCKETED	
Docket Number:	18-IEPR-03
Project Title:	Southern California Energy Reliability
TN #:	223522
Document Title:	SCE Comments on So Cal Reliability Workshop
Description:	N/A
Filer:	System
Organization:	Southern California Edison (SCE)/Catherine Hackney
Submitter Role:	Public
Submission Date:	5/22/2018 12:57:26 PM
Docketed Date:	5/22/2018

Comment Received From: Catherine Hackney
Submitted On: 5/22/2018
Docket Number: 18-IEPR-03

SCE Comments on So Cal Reliability Workshop

See attached.

Additional submitted attachment is included below.

May 22, 2018

California Energy Commission
Docket Office, MS-4
Re: Docket No. 18-IEPR-03
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: Southern California Edison Company's Comments on the California Energy
Commission Docket No. 18-IEPR-03: Southern California Reliability

Dear Commissioners:

On May 8, 2018, the California Energy Commission (CEC), the California Public Utilities Commission (CPUC), the California Independent System Operator (CAISO), and Los Angeles Department of Water and Power (LADWP) jointly held a workshop to discuss energy reliability in Southern California as part of the 2018 Integrated Energy Policy Report (IEPR) Update Proceeding ("the workshop"). Southern California Edison (SCE) participated in the workshop and appreciates the opportunity to provide these written comments.

SCE commends the Joint Agencies' for their continued efforts to maintain the reliability of the state's energy system. SCE thanks the CEC for providing SCE the opportunity to discuss recent developments on its infrastructure upgrades and its preferred and conventional generation portfolio. During SCE's participation on a workshop panel discussion, SCE received two questions from Commissioner McAllister with respect to Demand-Side Management (DSM) resources participating in utility Requests for Offer (RFOs).

1. What attributes does SCE look for in terms of meeting reliability and resiliency needs, and how do bidders prove out those attributes in their bids?

Answer: In meeting SCE's mandated reliability needs, SCE targets resources (typically via competitive solicitations, such as the current Moorpark LCR RFP) that qualify as resource adequacy (RA) resources. To qualify as a RA resource, SCE will consider the ability of the resources to meet the established RA requirements, including the resource's availability to provide at least four hours of load reduction for three consecutive days. Resources that can provide dispatch/custom duration beyond conventional RA rules may provide incremental value to the distribution system (e.g., peaking circuit). Additional reliability requirements might be established by the CAISO vis-à-vis its annual Local Capacity Technical Analysis, which specifies the

minimum resource capacity (in MW) required in each local sub area to maintain reliability. SCE will also evaluate resources submitted into a given solicitation to fulfill such additional requirements, if any.

SCE's resiliency objective is generally met by the above RA-related attributes; however, SCE has added in its pro forma contracts certain Goleta-specific resiliency obligations. These resiliency obligations require a higher level of commitment for resources to be available during a transmission outage event to ensure that resources are useful for grid restoration.

Whether related to reliability or resiliency, bidders prove out the attributes in bid packages submitted to SCE by attesting to such attributes with detailed product and offer information that is carefully screened by SCE subject matter expertise. Other tangential attributes, such as the bidder's experience and track record for constructing such projects are also considered. Should the respective bidders be shortlisted and ultimately enter into a contract (as Seller) with SCE, the contract will have strong provisions to ensure that the Seller will ultimately provide those attributes described in the bid.

2. What analytical tools does SCE use in evaluating DSM / distributed energy resources (DERs)?

Answer: Today, SCE measures and validates DR's ability to meet reliability on an after-the-fact basis, by considering the aggregated, participating customers' meter data and load reduction potential. As new grid tools are deployed, such as the Advanced Distribution Management System and the Distribution Resource Management System, SCE will seek to leverage these tools to monitor and determine—in real-time and, specifically, for inverter-based DERs—the ability of DR's and other DER's to meet reliability needs.

SCE appreciates the Joint Agencies' consideration of these comments and looks forward to its continuing collaboration with the Energy Commission and stakeholders. Please do not hesitate to contact me at (916) 441-3979 with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Very truly yours,

/s/

Catherine Hackney