

DOCKETED

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California Energy Commission
Docket Office, MS-4
Re: Docket No. 21-OIR-01
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: Southern California Edison Company's Response to the California Energy Commission's March 22, 2023 Request for Information Docket No. 21-OIR-01

Dear Commissioners:

SCE appreciates the opportunity to respond to the California Energy Commission's (CEC) Order Instituting Rulemaking (OIR) to Amend Regulations Governing the Power Source Disclosure Program. SCE supports the CEC's objectives to minimize the reporting burden and costs and appreciates the added transparency the proposed changes could bring. In the CEC's Request for Information sent March 22, 2023, the Commission is seeking to assess the feasibility of annual reporting of hourly sources of electricity and the associated greenhouse gas (GHG) emissions. SCE below provides an itemized response to the seven questions considered.

Response to Questions

Questions for Electricity Sellers from Generation or Storage Facilities

Question 1: Discuss the feasibility and financial impact of providing each purchaser from your generation facility with the purchaser's hourly share of electricity that is scheduled into a California balancing authority.

SCE response to Question 1: SCE currently tracks and stores generation at the hourly and sub-hourly level. SCE is implementing the Voluntary Allocation Market Offer (VAMO) process which uses generation at the hourly level to allocate Renewable Energy Credits (REC). SCE has the required data and systems to support this calculation. The financial impact of this calculation is low to moderate. The calculation is more complex than the process for the current Power Content Label / Power Source Disclosure (PCL/PSD) compliance filing and will require more labor effort. REC sales and Greenhouse Gas (GHG) Free allocation may add further complexity which would require clarification on how to account for these shares. A more detailed financial impact can be provided if required.

Question 2: Discuss the feasibility and financial impact of providing each purchaser with its hourly share of exported electricity from your energy storage facility and the hourly electricity

consumed by your facility in prior hours necessary to export that electricity after taking into account round-trip storage losses.

SCE response to Question 2: SCE currently tracks and stores battery charge and discharge activity at the hourly and sub-hourly level. SCE does not presently sell or share the output of its energy storage facilities. Including hourly battery charging and discharging in the hourly load position is feasible. The financial impact of this calculation is low to moderate. A more detailed financial impact can be provided if required.

Questions for Retail Electricity Suppliers

Question 1: Discuss the feasibility and financial impact of obtaining hourly delivery data for each specified procurement for each hour of the year, organizing that hourly data into an Excel template provided by the CEC, and reporting that data to the CEC annually.

SCE response to Question 1: SCE currently tracks and stores generation at the hourly and sub-hourly level. SCE has the required data and systems to support organizing that data into a template and reporting annually. SCE would appreciate having an opportunity to review and comment on the template prior to its adoption to assure that it is consistent with the data in SCE's systems. The financial impact of this calculation is low to moderate. The calculation is more complex than the process for the current Power Content Label / Power Source Disclosure compliance filing and will require more labor effort. A more detailed financial impact can be provided if required.

Question 2: Discuss the feasibility and financial impact of obtaining and reporting hourly settlement data from your retailer's balancing authority.

SCE response to question 2: SCE supports the current PCL/PSD process that aggregates meter data for reporting. SCE does not rely on hourly settlement data from the CAISO for Power Content Label reporting. Requiring the PCL/PSD to use hourly settlements data is a change from the existing process and would be less feasible than the existing process. We would need to develop new systems and processes to use settlement statements from the balancing authority. SCE is not the scheduling coordinator for every element of the Schedule 1 and does not have the settlement statement data for which it is not the scheduling coordinator. Some specified sources are aggregated with other specified sources for scheduling and settlement purposes which would limit the available detail for reporting. Some specified sources are not scheduled with any balancing authority (for example, Catalina Island generation). The financial impact of using settlement statement data would be moderate. The calculation would be more complex and more data intensive than the current process which relies on meter data and will require more labor effort. A more detailed financial impact can be provided if required.

General Questions

Question 1: Under an hourly load matching framework, what should be the load order for determining which resources are matched to load first? In other words, which resource types should be deemed to be overprocured/overdelivered during hours in which a retailer's specified procurements exceed its hourly loss-adjusted load?

SCE response to Question 1: SCE supports continuing the existing CEC Power Content Label loading order. The current template first reduces unspecified purchases then natural

gas then coal and other fossil procurement and finally pro-rata reduces the remaining Nuclear, Large Hydro, Renewable and Asset Controlling Supplier procurement.

Question 2: How will hourly load matching affect grid reliability in the state, particularly during emergency events?

SCE response to Question 2: Power Content Label reporting is an annual report that is developed and submitted 6 months after the close of the report year, there should be no effect on grid reliability.

Question 3: How should in-state and out-of-state line losses be calculated for determining loss-adjusted load?

SCE response to question 3: SCE supports continuing the current Power Content Label process for determining the load. The current Power Content Label process relies on meter data at the customer level for the load and relies on meter data at the generation level for specified procurement.

Conclusion

SCE thanks the CEC for consideration of the above comments. Please do not hesitate to contact me at (626) 302-0905 or Dawn.Anaiscourt@sce.com with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Very truly yours,
/s/
Dawn Anaiscourt

