

# Comments of Southern California Edison: Self-Supply of Balancing Services

Southern California Edison (SCE) appreciates the opportunity to comment on Self-Supply of Balancing Services Version 1 Business Practice. If you have any questions, please contact: John Zoida, (626) 302-3336, john.zoida@sce.com.

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Comment 1: Unclear of the intent of the following sentence under Section D. 6.:

“a. Except for the replacement of a resource due to a contingent event as provided for in Section I of this business practice.”

Comment 2: Ensure consistent capitalization of “Variable Energy Resource” and “variable Energy Resource Balancing Services” throughout the document.

Comment 3: At least on a high level, please offer additional text to elaborate on the following sentence under Section E. to explain (perhaps with an example) why there would be more than one Centroid:

“1. BPA may designate more than one Self-Supply Centroid to facilitate the Self-Supply of Balancing Services Program.”

Comment 4: Please revise the following sentence under Section G. 1. as follows:

“The reserve requirement will be communicated to each Self-Supply Customer on a planning basis at the start of the rate period for each month of the rate period, [as the reserve requirement quantity may differ from month to month.](#)”

Comment 5: Regarding the following sentence under Section G. 1.a., “ 1. If for any month during the rate period the reserve requirement for the Self-Supply Customer changes by more than 1 MW...”, does BPA recognize that there can be a 1 change MW each month (so, a 24MW change over a 24-month Rate Period) whereby the Self Supply Customer won’t be required to increase or decrease its reserve requirement?

Comment 6: Please revise the following sentence under Section J. 1. as follows:

“c. BPA Transmission Services will notify the Self-Supply Customer of a strike by letter, email, or phone call [within 24 hours of such strike occurring.](#)”

Comment 7: In the following sentence under Section J. 1., “e. BPA reserves the right to selectively limit generation or selectively curtail generation schedules submitted by a Self-Supply Customer that does not supply sufficient capacity or energy to meet its Self-Supply obligations.”, please explain why BPA wants the right to limit a resource’s generation that isn’t generating adequate quantities. Without an understanding, SCE recommends to eliminate this sentence.

Comment 8: Please revise the following sentence under Section J. 2. as follows:

“b. If a Self-Supply Balancing Resource receives three strikes in a rolling 30 day calendar period because of the failure of the Self-Supply Balancing Resource to deploy the amount of energy dispatched by BPA Transmission Services, the Self-Supply Balancing Resource, not necessarily the Self-Supply Customer, will be disqualified from providing Balancing Services.

Comment 9: Please revise the following sentence under Section K. as follows:

“2. A Self-Supply Customer and the owner or, if applicable, the operator, of a Self-Supply Balancing Resource are subject to Dispatcher directives.