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Subject: [EXTERNAL] SB 1383 ESS Operation and Maintenance Standards
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Good afternoon,

Southern Power Company appreciates the opportunity to provide feedback and would like to submit the following comments for consideration and clarification of the changes proposed for GO 167-B.

- Section 7.2.4.1 – Southern Power seeks clarity in understanding the requirements for filing the Initial Certification for plants already in Active Service before the revised General Order takes effect.
- Section 9.3.1 – This section requires daily reports, identifying any periods of derates, to be submitted to the ISO. Given the fluctuating availability of Southern Power’s ESS sites, which is already reported through Versify (received by CAISO), will Versify data fulfill this requirement?
- Section 9.3.3 – The General Order mandates GADS implementation within 180 days of its effect. Southern Power proposes extending the transition period based on our experience with solar GADS implementation.
- Section 9.4.1 (c) – The requested level of information is typically not available within 24 hours. Extending this timeline is necessary to prioritize safety and damage assessments.
- Section 9.4.1 (d) – The requested level of information is typically not available within 24 hours. Continuous monitoring of public news stories is challenging. Southern Power recommends removing this requirement or extending the compliance timeline.
- Section 10.3 – Clarity is sought regarding the purpose and frequency of testing. Performance tests often necessitate outages, impacting ESS revenue. Could the reports from annual capacity tests, required for power purchase agreements, suffice?
- Appendix B Section II – Southern Power seeks clarity on what constitutes "detailed entries" for O&M logs. For instance, would a Work Order number, description, asset, and time meet this standard?
- Appendix B Section II – Each facility must record a plant status entry daily, typically done through Versify, where daily derates are updated and sent to CAISO. Will Versify data meet this requirement?
- OS 25 – Regarding the Transfer of Ownership, does the notification for changes in ownership apply to minority owners.

Thank you,

Marie Thompson

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