

Southern California Edison's Comments on the CAISO's Draft MRTU Readiness Certification Plan dated November 20, 2007

Pursuant to the CAISO's market notice dated November 20, SCE provides the following comments on the CAISO's Draft MRTU Readiness Certification Plan (Plan). SCE appreciates the opportunity to provide these comments and is committed to continue working with the CAISO and stakeholders to address MRTU readiness issues.

60-Day Readiness Certification Filing

The November 20 draft Plan provides a reasonable outline for the 60-day ready certification filing. However, additional details on each element of the plan are needed, including the process for stakeholder review and input prior to the 60-day readiness filing. For example, regarding Item #5 (Status of Market Simulation and Market Simulation Exit Criteria), there is currently not a clear path or deadline to gain agreement between the CAISO and market participants on the final market simulation exit criteria. In addition, completion dates for the "Remaining Activities and Milestones – Anticipated milestones" should be provided.

Timeline of CAISO Activities

Given the MRTU market simulation schedule and FERC's requirement for the CAISO to make a readiness certification filing 60 days prior to MRTU go-live, the Plan's proposed timeline seems like a reasonable approach to address the readiness of the CAISO and stakeholders. However, more information needs to be included in timeline regarding stakeholders interaction prior to key deadlines (e.g. the 60-day certification filing, the March 4-5 Board meeting, and the March 10 twenty-one day informational filing). SCE recommends that the CAISO develop a more detailed schedule for stakeholder input to supplement key milestones in the November 20 draft MRTU certification plan. For example, indicate a date by which the CAISO would issue a draft (or at least additional details) on the 60-day compliance filing, preferably prior to the release of the Board memo for the January 28 meeting. Another example is to provide a date by which agreement would be reached on the Market Simulation Exit Criteria.