

Commitment Cost Enhancements 3 12/18/2018 call - Stakeholder Comments

Submitted by	Company	Date Submitted
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Southern California Edison (SCE) offers the following comments on the California Independent System Operator (CAISO) proposed changes to be presented on the December 18, 2018 call¹.

SCE cannot support the proposed tariff language due to conflicts

The proposed changes in the tariff deal with how use limitations are managed and directly overlaps with efforts in the BPM change management process. Specifically, PRRs 1017 and 1088, as well as SCE's efforts in CIDI 207966, were undertaken to address management of use limitations. There is still no resolution within the BPMCM process.

As such, SCE cannot support this proposed language and urges the CAISO to address use limitation management in a consistent manner.

¹ <http://www.caiso.com/Pages/documentsbygroup.aspx?GroupID=DCE35286-A615-48DB-BC95-C36B6D237867>