Stakeholder Comments

Bidding Rules Enhancements Correct Inefficient Accounting of Minimum Load Costs after Pmin Rerate

Submitted by	Company	Date Submitted
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The following are Southern California Edison's (SCE) comments on the California Independent System Operator's (CAISO) January 14, 2016, conference call¹.

As stated in prior comments², SCE supports the CAISO proposal to modify the minimum load cost (MLC) based on the default energy bid (DEB) costs. SCE also supports the CAISO proposal for including an adjustment mechanism within the proposal to account for the additional commitment costs required to attain the higher Pmin.

 $^{^{1}\,\}underline{http://www.caiso.com/Documents/Agenda_Presentation_BiddingRulesEnhancementsDraftFinalProposal.pdf}$

² http://www.caiso.com/Documents/SCEComments BiddingRulesEnhancements RevisedStrawProposal.pdf