Stakeholder Comments

Commitment Cost Enhancements Draft Tariff Language Posted on September 17, 2014

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SCE respectfully requests that the ULR definition be modified to remove the ambiguity that the current definition does not explicitly address monthly/annual use limitations. SCE suggests the following change for consideration.

Definition of Use-Limited Resource (Tariff, Appendix A)

A resource that, due to design considerations, environmental restrictions on operations, cyclical requirements, such as the need to recharge or refill, or other non-economic reasons, is unable to operate continuously on a daily basis, but is able to operate for a minimum set of consecutive Trading Hours each Trading Day. A resource that, due to design considerations, environmental restrictions on operations, cyclical requirements, or other non-economic reasons, has monthly or annual, use limitations.