

## Stakeholder Comments on: CAISO Tariff Clarification Filing

Submitted by	Company	Submitted Date
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Southern California Edison "SCE" provides the following comments on the CAISO's bucket filing of tariff clarification.

### **Section 5.2 Schedule 3 Appendix F**

SCE proposes the following sentence be added to Section 5.2 of Schedule 3 of Appendix F. The purpose of the change is to ensure that Participating Transmission Owners (PTO's) will not have to needlessly divide their transmission revenue requirements into "New" and "Existing" components upon expiration of the Transition Period. The ISO has added many similar sentences in this area, stating that certain requirements related to the ten-year transition to grid wide Transmission Access Charge rates cease when the Transition Period expires (January 1, 2011). Without this sentence PTO's would still be required to do this division. Not accepting SCE change would result unnecessary work for PTO's beginning next year.

Each Participating TO will develop, in accordance with Section 6 of this Schedule 3, a High Voltage Transmission Revenue Requirement (HVTRR PTO) consisting of a Transmission Revenue Requirement for Existing High Voltage Facility (EHVTRR PTO) and a Transmission Revenue Requirement for New High Voltage Facility (NHVTRR PTO). The HVTRR PTO includes the TRBA adjustment described in Section 6.1 of this Schedule 3. At the conclusion of the ten-year TAC Transition Period, the Transition Charge will cease to apply, and the HVAC will be based on the single CAISO Grid-wide rate. Accordingly the requirement for each Participating TO to divide its HVTRR into new and Existing components shall cease to apply.

### **Section 11.19.1.2 Annual Charges Assessment**

SCE recommends the CAISO accept the following changes to section 11.19.1.2. The changes proposed do not modify the intent of the section but rather, in our view, better describe the process under Payment Acceleration.

For Scheduling Coordinators electing monthly settlement of FERC Annual Charges, the charges are assessed each Trading Month in the same semi-monthly Invoice or Payment Advice containing the market Settlement and Grid Management Charge issued in

accordance with the CAISO Payment Calendar. For Scheduling Coordinators electing yearly settlement of the FERC Annual Charges, the charges for a given Trading Month that are due annually are issued in accordance with the CAISO Payment Calendar on the same day as the market Invoice or Payment Advice but in a separate Invoice as indicated in Section 11.29.10, and the amounts charged are issued to Scheduling Coordinators in each semi-monthly billing period as indicated in Section 11.29.10.

### **Section 30.7.3.1 & 30.7.6.1**

Changes to sections 30.7.3.1 and 30.7.6.1 include changes extending spinning reserve and non-spinning reserve bids. SCE questions whether the clause “and” between the terms Spinning Reserve and Non-Spinning Reserve should be an “or”.

The CAISO will not insert or extend any Bid for Regulation Up or Regulation Down in the Real Time Market for a Use-Limited Resource except as provided in Section 40.6.8. The CAISO will not insert or extend a Spinning Reserve and Non-Spinning Reserve Ancillary Service Bid at \$0 in the Real Time Market for any certified Operating Reserve capacity of a resource unless that resource submits an Energy Bid and fails to submit an Ancillary Service Bid in the Real Time Market.

### **Section 37.11.1 Method for Calculating Inaccurate Meter Data Penalty**

SCE recommends the CAISO remove the following change to section 37.11.1 from the tariff filing, as the change is not a clarification type change but rather significantly alters the timeline of what constitutes a Rule of Conduct violation. The existing tariff states that a Rule of Conduct violation may occur for meter data errors that are discovered after issuance of a Recalculation Settlement Statement<sup>1</sup>. Given its definition, the earliest a Rule or Conduct violation could occur is T+38B (52 Calendar days). The CAISO proposed modification of T+43 Calendar days shortens the timeline to submit meter data without penalty significantly, by 9 days. SCE does not view this change as a clarification, but rather, one having both policy and process impacts that require more discussion and review by stakeholders. SCE recommends this change be removed and incorporated into a future stakeholder process on settlement/meter data enhancements.

There is no Sanction for the submission of inaccurate Meter Data used for an Initial Settlement Statement T+ 7B. However, an error in submitted Meter Data that exists after forty three (43) calendar days after the Trading Day (T+43C) is discovered after issuance of a Recalculation Settlement Statement constitutes a Rule of Conduct violation. The level of the Sanction depends on whether the Scheduling Coordinator or the CAISO discovered the error. An increased penalty will apply for errors that are discovered by the CAISO.

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<sup>1</sup> The definition of a Recalculation Settlement Statement is included in Appendix A of the tariff and includes statements at T+38B, T+76B, T+18M, T+35M and T+36M.