

PRR 1122 - Stakeholder Brief

Submitted by	Company	Date Submitted
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Southern California Edison (SCE) offers the following Stakeholder Brief on the California Independent System Operator (CAISO) Proposed Revision Request 1122¹.

SCE agrees with and supports the reply briefs of Pacific Gas & Electric (PG&E) and Six Cities

On January 21, 2020, PG&E² and Six Cities³ submitted reply briefs on the PRR 1122 appeal process. Among the arguments presented, Six Cities outlined the inappropriate comparison of the Deutsche Bank example, and that the PRR 1122 proposal distorts the CAISO's reporting authority such that it will create adverse outcomes through reporting false positives to the FERC. PG&E underscored how the PRR 1122 proposal was a policy change and belonged in a larger policy initiative stakeholder process.

Both parties clearly described how the tariff did not support the PRR 1122 proposal, that transparent and accurate information cannot be false or misleading, and that there is no threat to the CAISO reliability that can be claimed through this proposal.

In sum, the CAISO's PRR 1122 proposal creates no value but does create a cost and, at best, has questionable validity. SCE supports the rejection of this proposal for all the reasons cited by PG&E and Six Cities.

¹ <https://bpmcm.caiso.com/Pages/ViewPRR.aspx?PRRID=1122&IsDlg=0>

² http://www.caiso.com/Documents/PG_EReplyBrief-PRR1122-Jan212020.pdf

³ <http://www.caiso.com/Documents/SixCitiesReplyBrief-PRR1122-Jan212020.pdf>