SCE Comments on Proposed Tariff Language for

Intertie Deviation Settlement

Submitted by	Company	Date of Submission
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SCE appreciates the opportunity to comment on the draft tariff language proposed for implementation of the intertie deviation settlement policy developed within the stakeholder process. We approve of the language as proposed with the exception of the following corrections that are needed:

- 1. In Section 11.31.1.1, the text should read as follows: For Self-Scheduled Hourly Blocks for Energy and Ancillary Services....... rather than the missing d from Schedule as appears on the first line of the draft language.
- 2. In Section 11.31.1.2, the language as drafted accounts only for the over-delivered quantity and fails to address the under-delivered quantity. To account for under-delivery, the language should be adjusted to reflect that the absolute difference between the HASP Advisory Schedule and the quantity of the transmission profile of the E-Tag rather than the current text that reference "exceeds". As a result, the tariff language in Section 11.31.1.2 needs to reflect similar language as Section 11.31.1.1 to account for under/over delivery. If 15-minute resources are exempt from the under-delivery charge, please elaborate why the exemption is granted.
- 3. In Section 30.5.7.4 paragraph 3 there is an incomplete sentence at the beginning of the paragraph. The incomplete sentence should be eliminated though the remaining content in the paragraph should be retained.