

## Stakeholder Comments

### Seven-Day Advanced Outage Submittal Proposal

Submitted by	Company	Date Submitted
David Schiada (626) 302-5262 Alexander Morris (626) 664-9926	Southern California Edison	January 11, 2012

Southern California Edison (SCE) appreciates the opportunity to comment on the CAISO's Seven-Day Advanced Outage Submittal straw-proposal.

**1. SCE requests notification of outage approval three business-days prior to the outage for all outages, regardless of submittal timeframe.**

SCE has concerns about the time frame for CAISO responses to transmission outage requests. Under the current proposal in which the CAISO may grant outage approval three business days prior to the outage start date, excluding any unforeseen event which would delay a response, the Participating Transmission Owner (PTO) may have as few as two business days to prepare switching procedures and schedule personnel. SCE requests that the CAISO provide notice three full business days in advance in order to allow for reasonable preparation to accommodate switching procedures, scheduling of personnel, and safety issues.

**2. The CAISO should publicly release outage information as soon as possible to enhance market efficiency.**

In updating rules for advanced outage notification, the CAISO should also update rules to release this information to market participants. Market participants can leverage this information to make more optimal scheduling and bidding decisions, ensuring more efficient markets and improving CAISO system performance. Given the CAISO's proposed response times to outage notifications, outage schedules should be publicly available *days* in advance, coincident with CAISO approval to the PTO of planned outages.