

## Stakeholder Comments

### 2016 Stakeholder Catalog

Submitted by	Company	Date Submitted
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The following are Southern California Edison’s (SCE) comments on the California Independent System Operator’s (CAISO) October 7, 2015 Catalog<sup>1</sup>.

Initiatives 5.2.4 (Regional Transmission Access Charge Structure), 5.2.5 (Resource Adequacy Rules, and 6.5.1 (CRR Modifications) are related. These topics should be considered as PacifiCorp joins the CAISO as a full market participant. Other topics that also should be considered in scope of PacifiCorp’s inclusion are the appropriateness of on-peak/off-peak periods, whether CRRs should fully fund, etc.

SCE believes that 6.8.1 (Transmission Interconnection Process) should be undertaken by the CAISO as an initiative. With disparate tariffs for the interconnection of transmission, along with the anticipated increased number of transmission interconnection requests given the implementation of FERC Order 1000, it is becoming increasingly difficult to properly sequence the interconnection studies for generator and transmission interconnection requests. With the successful bid by an independent transmission developer to develop, construct and own the Delaney-Colorado River transmission line project as well as the pending CAISO decision regarding the developer for the Harry Allen-Eldorado transmission line project, the Transmission Interconnection Process topic has garnered greater urgency. The CAISO should seriously consider in 2016 a means to better harmonize the interconnection requests for both transmission and generation.

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<sup>1</sup> [http://www.caiso.com/Documents/Draft\\_2016StakeholderInitiativesCatalog\\_Roadmap.pdf](http://www.caiso.com/Documents/Draft_2016StakeholderInitiativesCatalog_Roadmap.pdf)