Stakeholder Comments on: CRR Non-Credit Issue Draft Tariff Language

Submitted by	Company	Submitted Date
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Southern California Edison "SCE" submits the following comments on section 36.8.5.7 of the CRR Non-Credit draft tariff language.

6.8.5.7 - "The affected LSEs shall contact CAISO and the UDC, MSS or other entities that provide distribution service to customers that calculate this migration information, of any dispute regarding the load migration data provided to the CAISO no later than four calendar days after the CAISO and the affected LSE have received the load migration data."

- Four calendar days seems like a very short time to review load migration data for dispute purposes.
- 4 days is tied to the date the CAISO and "affected" LSE received the load migration data; how do we know when another entity receives data? As an alternative, the dispute clock should start xx days after the CAISO notifies all impacted LSEs (load losing and load gaining) that it has received (validated) the data?