

Stakeholder Comments

Draft Final Proposal: A New Scheduling Priority Class for Regulatory Must-Run Pumping Load in the Integrated Forward Market

Submitted by	Company	Date Submitted
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Southern California Edison “SCE” provides the following comments on the proposal for changes to Regulatory Must-Run generation classification per the whitepaper dated February 22, 2011.

SCE supports the proposal to create a new scheduling priority class in the Integrated Forward Market (IFM) for regulatory must-run (RMR) pumping load. SCE reiterates its statements in its January 11, 2011 stakeholder comments submission and supports the California Independent System Operator (CAISO) Corporation’s proposal to create a new IFM scheduling priority class for RMR pumping load. The CAISO’s proposal of annual certification of RMR pumping load in conjunction with documentation supporting a facility’s legal (federal or state) obligation to pump are reasonable requirements. In turn, it is SCE’s understanding the new scheduling priority class proposal will apply to traditional water-pump loads as opposed to other non-critical loads such as pump storage facilities.