

Stakeholder Comments Template

Subject: Draft Final Proposal for Transmission Reliability Margin

Submitted by	Company	Date Submitted
Rich Mettling 626.302.9712 rich.mettling@sce.com	SCE	February 15, 2012

SCE appreciates the opportunity to respond to the CAISO Draft Final Proposal on Transmission Reliability Margin (TRM). SCE is supportive of the current formulation of TRM which will include timely publication of the TRM information and improved coordination of HASP with real time dispatch.

SCE is satisfied that the range of options included in the NERC reliability standard has been narrowed to an appropriate set of components in the CAISO tariff. SCE appreciates that the CAISO has produced a TRM process that will include only three uncertainty components to be evaluated within a very specific 2 hour window prior to the operating hour. That process should have minimal impact on other market operations and still address the HASP scheduling problem as observed by the CAISO.

The question of orderly curtailments and the current approach of BPM section 2.5.2, 5.1, 6.6 and 7.5 remains an issue. Although more appropriately addressed in another venue, this TRM stakeholder process highlights the range of issues touched by inertie curtailment.

In conclusion, SCE believes that TRM is an appropriate solution to the problems identified by the CAISO.