



Karen Edson  
VP, Policy and Client Services

May 9, 2013

Via Electronic Mail: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)  
CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, California 94102

**Re: Southern California Edison Advice Letter 2889-E**

The California Independent System Operator Corporation (ISO) provides these comments on Advice Letter 2889-E submitted by Southern California Edison (SCE) on April 23, 2013. The ISO supports SCE's proposed pilot program in which two retail customers, the Los Angeles Air Force Base (LAAFB) and the Naval Air Weapons Station at China Lake (China Lake), will directly participate in the ISO's wholesale energy and ancillary service markets through the use of plug-in electric vehicles.<sup>1</sup> The ISO understands that SCE will serve as the resources' scheduling coordinator and submit bids into the ISO market on their behalf. These resources will use the ISO's non-generator resource model, which allows the ISO to dispatch storage resources that can act as both generation and load to any operating level within resources' entire capacity range. This program is a significant step in the development of vehicle-to-grid projects and the ISO strongly encourages the Commission to approve SCE's Advice Letter.

Sincerely,

Karen Edson  
Vice President, Policy and Client Services

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<sup>1</sup> The ISO has conferred with SCE regarding its concerns with proposed Special Condition 8 of Schedule V2G Pilot (SCE Vehicle to Grid Experimental Pilot) Sheet 3. SCE has informed the ISO that it will remove this special condition from its proposed tariff sheets for the program.

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