

### Stakeholder Comments Template

SCE Comments on the California ISO has posted draft tariff language on the Seven-Day Advanced Outage Submittal initiative for stakeholder review. Please submit comments by close of business April 16, 2012. The ISO has scheduled a stakeholder call on April 23 to discuss the language.

*Please submit comments (in MS Word) to [caisotariff@caiso.com](mailto:caisotariff@caiso.com) by 4/16/12.*

Submitted by	Company	Date Submitted
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Southern California Edison ("SCE") appreciates the opportunity to comment on the California Independent System Operator's (CAISO) Seven-Day Advanced Outage draft tariff language stakeholder process.

After reviewing the draft tariff language, SCE's primary recommendation is that there needs to be an opportunity for the ISO and the PTOs to consider implementation details to ensure a process to further stipulate the terms and conditions (or procedures) to determine a facility's "Necessity for Reliability".

As stated in the 'Proposal' section supporting the CAISO's Decision **on Seven Day Advanced Transmission Outage Proposal**, "*Outages of transmission facilities that (i) are necessary for reliability, (ii) do not have a market impact, and (iii) arrive in fewer than seven days in advance of the outage will not be rejected as untimely and will be considered on a first-come, first-served basis, under Outage Management's existing practices.*" Additionally, during the ISO Board meeting there was discussion that the ISO would include flexible language to incorporate requests that would prevent a reliability situation (e.g. unforeseen and emergency situations) and that the tariff language should not be overly prescriptive.

Additionally, the CAISO should also clarify rules in the tariff for outages requested or rescheduled within the 7-day period. While SCE is extremely committed to the appropriate and timely submittal of transmission outage requests and to the adherence of all established CAISO rules and procedures, there may be situations when the dynamic nature of the system, or the progression of work on complex projects dictate that transmission outages be requested or re-scheduled within the 7-Day period. Rules for how these situations are treated for these likely infrequent occasions should be codified in the tariff.

SCE suggests the Transmission Maintenance Coordination Committee (TMCC) (or a team to be developed) to consider the implementation details in support of this tariff change and whether the BPM and/or procedures need to be updated to implement this tariff change. By including it as a future TMCC

agenda item, this will allow for an opportunity for a review of the changes and ensure steps are taken to implement it. SCE is interested in establishing a procedure or process to better address the determination of whether a facility is needed for reliability.

In summary, SCE's position is not in opposition to the 7-Day Advanced Outage Submittal draft Tariff but would appreciate the opportunity to discuss and work with the CAISO on a process as described above to ensure that more clarity, collaboration, and flexibility is crafted into the amendment to account for those times when system reliability and/or other emerging issues need to be resolved.