

**Stakeholder Comments on:
CRR Credit Policy Enhancements Draft Tariff Language
May 4, 2010**

Submitted by	Company	Submitted Date
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Southern California Edison "SCE" appreciates the opportunity to provide comments on the CRR Credit Policy Enhancements draft tariff language, dated May 4, 2010.

Section 12.6.2 Credit Requirements for CRR Auctions

The description of the pre-auction CRR credit requirement calculation is confusing and should be rewritten to better reflect the policy paper. To avoid any ambiguity in the requirements SCE recommends the ISO include in the tariff language the formula described in section 4.1.1.3 of the draft final proposal. Short of that, the language needs to better describe the individual components of the pre-auction credit requirement calculation, namely the bid segment component and the credit margin component. For example, the section describing the core calculation could be written as:

.....for each CRR the sum of (a) highest bid segment MW value multiplied by its corresponding bid price and (b) the credit margin associated with the highest bid segment MW. For negatively valued CRR's the bid price described in (a) above will be considered zero.