

Comments of Southern California Edison Company Concerning Recommendation on Qualifying Facilities' Outage Reporting Exemption

Submitted by	Company	Date Submitted
Joni A. Templeton joni.templeton@sce.com (626) 302-6210	Southern California Edison Company	September 14, 2011

Southern California Edison Company ("SCE") submits these comments pursuant to the California Independent System Operator's ("CAISO") request for comments on the CAISO's recommendation regarding the Qualifying Facility ("QF") exemption from outage reporting requirements in the standard capacity product ("SCP") 2 tariff provisions.

SCE appreciates the CAISO's careful evaluation of this issue. SCE would like to clarify its understanding of the CAISO's statement that QFs with existing power purchase agreements that amend an existing QF contract outside of the options available under the QF Settlement must comply with the CAISO tariff. SCE interprets the term "amend" in the CAISO's recommendation to mean a change in the original contract quantity, term and/or named resource consistent with the existing language in Section 40.9.2(2) that is not otherwise allowed by Section 40.9.2(3). Therefore, existing QF contracts that are amended to increase the original contract quantity (except where allowed by 40.9.2(3)), extend the term, or add to or replace original contract resources will be required to comply with outage reporting requirements; for other contract changes (*e.g.*, administrative or price changes), existing QF contracts will retain their grandfathering status. Assuming SCE's understanding of this language is correct, SCE fully supports the CAISO's recommendation.