

Comments of Southern California Edison Company on Standard Capacity Product II Draft Tariff Language

Submitted by	Company	Date Submitted
Gina M. Dixon Gina.Dixon@sce.com (626) 302-3589	Southern California Edison Company	May 27, 2010

Southern California Edison Company (“SCE”) has reviewed the California Independent System Operator’s (“CAISO”) Standard Capacity Product (“SCP”) Phase II Second Draft Tariff Language, dated May 20, 2010 (“Draft Tariff Language”) and appreciates this opportunity to make further comments.

Changes to Section 40.9.2

SCE believes the changes to Section 40.9.2 are a step towards clarifying the language, but makes the following recommendation as to the recently updated language:

The updated language attempts to create two contract types that are grandfathered if they were executed before August 1, 2010: (1) “Capacity under a resource specific power supply contract;” and (2) “Resource Adequacy Capacity that was procured under a contract that was either executed or submitted to the applicable Local Regulatory Authority for approval that meets the requirements in this subsection (2).” The language, however, only provides that the deadline is applicable to “[c]apacity under a resource specific power supply contract” in that the language states “except that the deadline date for the power supply contract shall be August 1, 2010.” SCE suggest that the last phrase regarding the deadline be modified to include “[r]esource Adequacy Capacity that was procured under a contract that was either executed or submitted to the applicable Local Regulatory Authority for approval that meets the requirements in this subsection (2).” SCE provides a suggested redline below:

Section 40.9.2(2)¹

For a Resource Adequacy Resources whose Qualifying Capacity value is determined by historical output, the Capacity under a resource specific power supply contract that meets the requirements in this subsection (2) or Resource Adequacy Capacity that was procured under a contract that was either executed or submitted to the applicable Local Regulatory Authority

¹ Note that these comments are applicable to both subsection (2) & (3).

for approval that meets the requirements in this subsection (2), will not be subject to Non-Availability Charges or Availability Incentive Payments, except that the deadline date for either type of contract ~~the power supply contract~~ shall be August 1, 2010 [PLACEHOLDER FOR DATE OF FERC ORDER] instead of June 28, 2009.