

May 29, 2024

Dear CAISO Board of Governors,

SCE appreciates the opportunity to provide comments on the CAISO's Final Proposal in the 2023 IPE initiative. Following an extensive stakeholder process, the Final Proposal sets forth essential revisions to the CAISO's current interconnection procedures in support of California's clean energy goals. SCE therefore supports the Final Proposal, which reflects a reasonable balance of perspectives among the broad set of stakeholders.

Specifically, SCE believes having commercial interest as a key indicator of a generating resource's commercial viability at the interconnection request intake process results in greater efficiency. It prioritizes projects that will proceed to the technical study process and are more likely to ultimately be procured by Load Serving Entities (LSEs).

SCE supports, as a crucial component of the proposal, the LSE point allocation process. Regarding this process, in the case of SCE, the California Public Utilities Commission has regulatory oversight of our procurement activities which includes a transparent process reviewed by an independent evaluator to ensure that SCE is acting in the best interests of our customers, and to ensure there is no preferential treatment of any party, including utility resources. To achieve a fair and consistent LSE allocation process, SCE believes the criteria and description regarding the basis an LSE will allocate capacity/points should be governed by the Local Regulatory Agency and not be included as an element of the CAISO's IPE tariff language.

SCE would like to thank the CAISO Board of Governors, and especially the CAISO staff for their work with stakeholders, in developing the comprehensive proposal before the Board. SCE urges the CAISO Board to approve the proposal.

Thank you for your consideration.

Sincerely,



Jeffrey Nelson