

Real-Time Imbalance Energy Offset (RTIEO) Draft Tariff Language Comments

Submitted by	Company	Date Submitted
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SCE appreciates the opportunity to provide comments on the draft tariff language. SCE urges that the California Independent System Operator (CAISO) file as soon as possible, and to request expedited action on this filing by the Federal Energy Regulatory Commission (FERC) in order to avoid millions of dollars of unwarranted costs to Load.

Until Virtual Bids are Suspended, Position Limits on the interties must be frozen:

The proposed changes in the tariff for section 30.7.3.6.3.2 (Position Limits at Interties)¹ will not lead to an immediate freeze in position limits during the FERC tariff change process. The unchanged tariff remains in effect until the FERC process concludes which means that, unless the FERC grants a waiver of the 60 day notice requirement, position limits will increase effective October 1, 2011. SCE strongly urges the CAISO file a motion with the FERC requesting that the Commission suspend the applicability of section 30.7.3.6.3 of the tariff relevant to position limits **at interties**.

¹ Page 5, <http://www.caiso.com/Documents/DraftTariffLanguage-Real-TimeImbalanceEnergyOffset2011andPriceConsistencyCausedByIntertieConstraints.doc>