

Stakeholder Comments

Revised Draft Tariff Language – Commitment Cost Enhancements Phase 3

Submitted by	Company	Date Submitted
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Southern California Edison (SCE) offers the following comments on the Revised Draft Tariff Language for the Commitment Cost Enhancements Phase 3 (CCE3) initiative of the California Independent System Operator (CAISO)¹.

SCE has raised the issue of the RDT attribute reporting responsibility being appropriately divided between LSE SCs and Generator Owners for market vs physical attributes, respectively. This is necessary in order to implement the CAISOs directives to utilize the physical characteristics of the resource under contingency circumstances while utilizing economic attributes during non-contingency circumstances. As such, this element must be addressed immediately within the CCE3 proposed tariff revisions as a prerequisite to carry out an effective market design.

¹ <http://www.caiso.com/Documents/RevisedDraftTariffLanguage-CommitmentCostEnhancementsPhase3.docx>