

Comments of
Southern California Edison

**Deliverability of Resource Adequacy
Capacity on Interties**

Submitted by	Company	Date Submitted
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This template is for submission of stakeholder comments on the topics listed below, covered in the *Deliverability of Resource Adequacy Capacity on Interties Draft Final Proposal* posted on May 5, 2011, and issues discussed during the stakeholder conference call on May 12, 2011, including the slide presentation.

Please submit your comments below where indicated. Your comments on any aspect of this initiative are welcome. If you provide a preferred approach for a particular topic, your comments will be most useful if you provide the reasons and business case.

Please submit comments (in MS Word) to RAimport@caiso.com no later than the close of business on May 19, 2011.

1. Do you support the ISO’s proposal? **Yes, SCE supports the CAISO's proposal, in general and in particular as it seeks to modify its current methodology to expand the intertie capacity values based on forward-looking data, rather than simply historical energy deliveries.**

2. What specific changes would you like the ISO to consider when preparing the draft Business Practice Manual (BPM) language for consideration in the BPM Change Management Process? Please explain your reasoning and the benefits that your proposed changes will provide.

3. If you have additional comments, please provide them here.