

Stakeholder Comments

Three Tariff Provision Modification Proposal

Submitted by	Company	Date Submitted
Aditya Chauhan – (626) 302-3764 Martin Blagaich – (626) 302-3302	Southern California Edison	February 17, 2017

Southern California Edison (SCE) offers the following comments on the Three Tariff Provision Modification Proposal¹ of the California Independent System Operator (CAISO).

SCE opposes the change to section 34.13.2 – Default Setting for Awards to Non-Dynamic System Resources

The Business Practice Manual (BPM) should be written based on the tariff, not the other way around. SCE opposes the CAISO proposal to change the tariff section to conform to the BPM. Further, the CAISO should elaborate on the circumstances that led to the BPM to change in May 2014 to non-conformance with the tariff.

SCE opposes the change to section 39.7.1.31 – Negotiated Default Energy Bid Implementation Time-Line

SCE opposes the CAISO changing the tariff. The CAISO should initiate a stakeholder process and demonstrate that three days are not reasonably feasible to implement a negotiated default energy bids. Further, the usage of “...**generally** become effective...” in the tariff, is concerning. Such language effectively grants the CAISO a non-binding deadline to implement bids.

SCE does not support removing the requirement to post EFC values for resources under construction at this time

The CAISO should initiate a stakeholder process to discuss why it is appropriate for a resource under construction to receive a NQC value but not an EFC value. SCE may support this tariff change in the future, but the record surrounding this change is not developed and the issue needs to be discussed.

¹ <http://www.caiso.com/Documents/Proposal-ModifyThreeTariffProvisions.pdf> & <http://www.caiso.com/Documents/DraftTariffLanguage-ThreeTariffProvisions.docx>