

## Stakeholder Comments Template

### 2019 Tariff Clarifications Filing Process – Addendum to comments

Submitted by	Organization	Date Submitted
<i>Aditya Chauhan</i> <i>Aditya.Chauhan@sce.com</i>	<i>Southern California Edison (SCE)</i>	<i>12/19/2019</i>

SCE provides the following addendum to its prior comments<sup>1</sup> on the California Independent System Operator (CAISO) draft in the 2019 Tariff Clarifications Filing Process<sup>2</sup>.

SCE thanks the CAISO for accommodating its concerns in the revised language matrix<sup>3</sup>. SCE has further concerns on other proposed changes, outlined below. SCE requests the opportunity to further discuss these, prior to the CAISO filing any language at the Federal Energy Regulatory Commission (FERC).

**The CAISO is proposing to remove the content of CAISO tariff section 37.4.1 and replace it with “Not Used.”**

SCE disagrees with the proposed changes as they are a change in policy and require a stakeholder process to be vetted. The CAISO’s proposal will allow the ability to fine on the first offense. Such a proposal changes compliance design to be clearly different from the existing language.

**37.8.4 The CAISO shall provide notice of the investigation...**

SCE disagrees with the proposed changes as they are a change in policy and require a stakeholder process to be vetted. These changes shift the burden of notification from the CAISO to the SC. In clear contrast, the existing language requires the CAISO to notify the relevant market participants.

---

<sup>1</sup> <http://www.caiso.com/Documents/SCEComments-TariffClarificationsFilingProcess-Dec11-2019.pdf>

<sup>2</sup> <http://www.caiso.com/Documents/Matrix-DraftTariffLanguage-2019Clarifications.pdf>

<sup>3</sup> <http://www.caiso.com/Documents/Matrix-RevisedDraftTariffLanguage-2019TariffClarifications.pdf> and <http://www.caiso.com/Documents/StakeholderCommentsMatrix-Dec2019TariffClarifications.pdf>