

SCE Comments on 2012 GMC Draft Final Proposal

Southern California Edison (“SCE”) submits these comments in response to the “2012 GMC Draft Final Proposal” dated February 22, 2011. SCE supports the proposed GMC rate structure as set forth in the proposal, with one exception.

As SCE has stated in previous comments (see SCE’s February 11 comments), SCE is opposed to the proposed grandfathering provision. If ISO management does decide to bring a grandfathering proposal to the Board for approval, SCE would urge the ISO to consider adding an additional limit: grandfathering should be limited to two years (2012 and 2013). An open-ended grandfathering provision (limited only by the contract expiration or “first opportunity for renegotiation”) is in SCE’s view unwarranted.

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SCE