

II. COMMENTS

SCE is supportive of the CAISO raising the effectiveness factor to a level above 0.5% but does not believe that 2%, as currently in production, is reflective of historical operating practices. Considering the many factors that go into reliably operating the system, depending upon a generator with only a 2% effectiveness to solve a true physical constraint is not consistent with real-world operational practices. To that extent SCE request that the Commission require the CAISO to perform additional analysis comparing congestion redispatch cost using the existing 2% value with redispatch costs using effectiveness factors of 3, 4, and 5 percent. Additionally, SCE would like the Commission to require the CAISO to conduct an analysis using different effectiveness factors between the Day-Ahead and Real-Time market. In its compliance filing the CAISO states that through such analysis they determined that setting the effectiveness threshold in the one-half to one percent range caused the market software to often resolve congestion utilizing resources that were remote from and minimally effective on the congested constraint. Nowhere in its compliance filing does the CAISO state that it performed analysis using an effectiveness factor higher than 2%. SCE believes increasing the effectiveness factor above 2% has the potential to further reduce the congestion redispatch costs to the market, and to better reflect a physical dispatch that can, over come all of the errors in metering and modeling, and physically resolve transmission congestion.

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III. CONCLUSION

For the foregoing reasons, SCE respectfully requests that the Commission require the CAISO to take the actions outlined above.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing **COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY ON THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION'S MARCH 23RD COMPLIANCE FILING** upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Rosemead, California, this 13th day of April, 2009.

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