

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

California Independent System Operator
Corporation

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Docket Nos. ER09-241-001

COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY ON THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION'S
MARCH 2, 2009 COMPLIANCE FILING

Pursuant to Rule 212 of the Rules of Practice and Procedure, 18 C.F.R. §385.212 (2008), of the Federal Energy Regulatory Commission (“FERC” or the “Commission”) and the Notice of Filing dated March 12, 2009, Southern California Edison Company (“SCE”) respectfully submits its Comments to the March 2, 2009 Compliance Filing (“Compliance Filing”) by the California Independent System Operator Corporation (“CAISO”) in the above-captioned docket.

I. INTRODUCTION

On March 2, 2009 in compliance with the Commission’s January 30, 2009¹ Order (126 FERC ¶ 61,082) (“Price Cap Order”), the CAISO filed proposed tariff modifications intended to “enable the ISO to implement a delay in posting certain prices resulting from the clearing of any of the MRTU markets, including prices that meet or exceed the price cap and floor.”

(Compliance Filing, p. 2) Specifically, in section 27.1.3 the CAISO added language that would require them to include in the weekly price correction report specified in Section 35.6 all prices at non-aggregated level that exceed the minimum and maximum settlement prices.

¹ <http://www.caiso.com/2346/2346d2c8514b0.pdf>

II. COMMENTS

SCE respectfully requests the Commission require the CAISO to provide additional clarification in its proposed changes to section 27.1.3 Maximum and Minimum CAISO Market Prices. While SCE fully supports publishing the unadjusted market prices in instances where the unadjusted market price is outside of the price cap and floor level, SCE requests that the CAISO should provide this same level of detail for all prices that are corrected not just those that fall outside of the price cap and floor levels. The language as drafted does not state that the CAISO will provide the same level of transparency for corrected prices that fall within the price cap and floor levels. The CAISO proposed language makes reference to tariff section 35.6 which list the data requirements of the weekly price correction report, none of which require the CAISO to publish the unadjusted market clearing price.²

In order to provide market participants with full transparency of all market prices that are corrected by the CAISO SCE requests the Commission require the CAISO to provide in its weekly pricing report the unadjusted market clearing prices for all prices that are corrected by the CAISO, regardless of if those prices fall outside the price cap and floor level. SCE provides the Commission with alternative language for section 27.1.3:

In addition to the analysis provided in the CAISO quarterly market performance reports on the maximum and minimum prices and price trends, the CAISO shall include in the weekly price correction report specified in Section 35.6 all **unadjusted** prices at a non-aggregated level **that resulted in a market price being corrected, including those** that exceed the minimum and maximum settlement prices specified in this Section 27.1.3, **as well as a full description of the reason for the price correction.** This Section 27.1.3 will no longer be in effect twelve months after the effective date of this section 27.1.3.

² The CAISO shall summarize all price corrections that occur within a week in a report that shall be posted on the CAISO Website by the seventh day of the following week. For all price corrections that occur during each week, the price correction report shall specify: (a) which market intervals were affected, (b) which price locations were affected, (c) a brief description of the reason for the price correction, and (d) the method of price corrective action undertaken.

III. CONCLUSION

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

Respectfully submitted,

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Dated: [March 23, 2009](#)

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 2, 2009 COMPLIANCE FILING** upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Rosemead, California, this 23rd day of March, 2009.

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