

**UNITED STATES OF AMERICA**  
**BEFORE THE**  
**FEDERAL ENERGY REGULATORY COMMISSION**

California Independent System Operator  
Corporation

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) Docket Nos. ER06-615-041  
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**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY ON THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION'S  
MARCH 30<sup>TH</sup> 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”), Southern California Edison Company (“SCE”) respectfully submits its Comments to the March 30, 2009 Compliance Filing (“Compliance Filing”) by the California Independent System Operator Corporation (“CAISO”) in the above-captioned docket.

As part of its compliance filing to address underscheduling in the Day Ahead Market, the CAISO proposed a revised definition of “CAISO IFM Curtailed Quantity:”

In each Trading Hour for each Scheduling Coordinator (a) the maximum of zero or the submitted Day-Ahead Self-Schedule for Demand minus the Day-Ahead Schedule for Demand in each applicable LAP, or (b) in the event a LAP price equals the maximum price for Energy Bids specified in Section 39.6.1.1, the maximum of zero or the submitted Day-Ahead Self-Schedule for Demand plus the quantity of Demand bid at the maximum price for Energy Bids specified in Section 39.6.1.1 minus the Day-Ahead Schedule for Demand in the relevant LAP.  
(Compliance Filing at p. 2)

Notably, in the new section “(b)” the language reads in relevant part: “... the maximum of zero **or** the submitted ....” (*Id.*, emphasis added). However, on Substitute Second Revised Sheet No. 847, the definition of the CAISO IFM Curtailed Quantity reads in relevant part: “... the

maximum of zero **of** the submitted ....” (Compliance Filing, Attachments A and B.) This language clearly changes the meaning, providing only the maximum of zero of the submitted bid for the self-schedule portion of any load bid that gets administratively curtailed. Because physical load can only bid positive MWs, the formula would always return zero for the self-scheduled portion, even though CAISO curtailed actual MWs. Therefore, as written self-scheduled load would never receive an exemption from charges.

Believing that this discrepancy was a mere typo, SCE brought it to the CAISO’s attention. The CAISO confirmed that the change was unintentional and that the correct text should read “... the maximum of zero **or** the submitted ....”

SCE requests that the Commission permit the CAISO to make the necessary change to the tariff language.

Respectfully submitted,

JENNIFER R. HASBROUCK  
ERIN K. MOORE

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By: [Erin K. Moore](#)

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-6848  
Facsimile: (626) 302-3540  
E-mail: [erin.moore@sce.com](mailto:erin.moore@sce.com)

Dated: [April 7, 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 30<sup>th</sup> COMPLIANCE FILING** upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Rosemead, California, this 7<sup>th</sup> day of April, 2009.

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Rodger Torres, Case Analyst  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770