

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

California Independent System Operator  
Corporation

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Docket Nos. ER06-615-048

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY ON THE**  
**CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION'S**  
**APRIL 23<sup>RD</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 April 23<sup>rd</sup>, 2009 Compliance Filing (“Compliance Filing”) by the California Independent System Operator Corporation (“CAISO”) in the above-captioned docket. The CAISO’s Compliance is in response to the Commission’s March 26, 2008 Order directing the CAISO to modify its proposed tariff language related to access to non-public Operating Procedures.<sup>1</sup>

SCE appreciates the CAISO’s proposal to permit operationally affected entities access to non-public Operating Procedures. However, SCE has two concerns with the proposed tariff language as drafted. First, the CAISO provides no method for resolving any disputes arising from its determination that an entity is not operationally affected. SCE proposes the following addition to the CAISO’s proposed language:

If the CAISO determines that the entity is not operationally affected by the Operating Procedure or portion thereof, the CAISO will explain the reason for its

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<sup>1</sup> *Order on Compliance Filing*, 126 FERC ¶ 61,276 (2009).

determination in its written response. If the entity wishes to dispute the CAISO's decision, it must do so in writing, citing the specific reason(s) why the entity believes it is operationally affected. CAISO will arrange a discussion with the concerned parties, if necessary, to review the dispute prior to making a final determination.

Second, the CAISO's proposed language fails to define what is meant by "agreed-upon controls."<sup>2</sup> There is no indication of whether such controls would be agreed-upon once and then used for all subsequent requests, whether they would be standardized for all entities, or at least all similarly-situated entities, and what happens if the parties are unable to settle upon mutually agreeable controls. The CAISO should be required to provide these details prior to approval by the Commission.

SCE respectfully requests that the Commission require the CAISO to add SCE's proposed additional language to section 22.11.3 to provide a dispute mechanism relating to the CAISO's determination of an entity's "operationally affected" status. Furthermore, SCE requests that the CAISO be required to provide additional details on the meaning of "agreed-upon" controls, as discussed above.

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<sup>2</sup> Filing Letter, p. 2. *See also* Attachment A, proposed text for §22.11.3.

Respectfully submitted,

JENNIFER R. HASBROUCK  
ERIN K. MOORE

/s/ 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: [May 15, 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 APRIL 23<sup>RD</sup> COMPLIANCE FILING** upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Rosemead, California, this 15<sup>th</sup> day of May, 2009.

/s/ Napa Utrapiomsuk  
Napa Utrapiomsuk  
Case Analyst  
SOUTHERN CALIFORNIA EDISON COMPANY

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