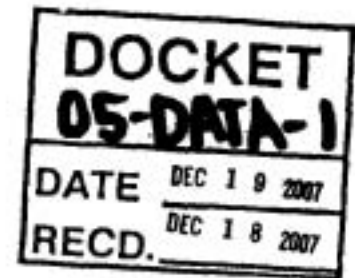




SOUTHERN CALIFORNIA
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December 19, 2007

California Energy Commission
Docket Office
1516 Ninth Street, MS-22
Sacramento, CA 95814-5512

Attention: **Docket No. 05-DATA-1** – Electricity and Natural Gas Data Collection

Dear Docket Office:

Southern California Edison Company submits the following comments regarding the Draft Forms and Instructions -- Electricity and Natural Gas Data Collection.

If you have any questions regarding this filing, please do not hesitate to contact me at (916) 441-2369.

Sincerely,

Manuel Alvarez

Enclosure

**Southern California Edison Company's Comments
On the Draft Forms and Instructions --
Electricity and Natural Gas Data Collection
(Docket No. 05-DATA-1)**

Southern California Edison Company (SCE) appreciates the opportunity to review and comment on the Draft Forms and Instructions -- Electricity and Natural Gas Data Collection. SCE offers the following minor comments and request for clarification:

Form 1306 D -- UDC Natural Gas Tolling Agreement Quarterly Report

Typically, SCE enters into tolling agreements with specific counterparties that operate several generating units. The amount of natural gas delivered under these agreements is measured by the counterparty and is not separately metered by unit. Thus, it would not be possible for SCE to provide the delivered gas amount on a per unit basis as requested in Form 1306 D. Instead, SCE would be able to provide the amount delivered by counterparty. In addition, the natural gas provided to SCE's counterparties is delivered through SCE's overall natural gas portfolio which includes several different sources (*e.g.*, current inventory and/or purchases). Therefore, the price provided by SCE in Form 1306 D would be based on a weighted average from these sources. Finally, SCE requests that the CEC clarify whether Form 1306 D is applicable to utility owned generation or strictly to purchases between SCE and third parties.