

DOCKET
11-IEP-1B

DATE	NOV 24 2010
RECD.	NOV 24 2010

November 24, 2010

California Energy Commission
Docket Office, MS-4
Re: Docket No. 11-IEP-1B
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.state.ca.us

Re: California Energy Commission Docket No. 11-IEP-1B: Comments Related to Staff Workshop on Electricity Resource Plans: Draft Forms and Instructions to Collect Electricity Supply Data from Load-Serving Entities

To Whom It May Concern:

On November 19th, 2010, the California Energy Commission (“Energy Commission”) held a Staff Workshop on Electricity Resource Plans: Draft Forms and Instructions to Collect Electricity Supply Data from Load-Serving Entities (the “Workshop”) in connection with the 2011 Integrated Energy Policy Report (“2011 IEPR”). Southern California Edison Company (“SCE”) participated in the Workshop and appreciates this opportunity to provide the following comments.

With respect to Form S-1, SCE can only provide an estimate of the Net Qualifying Capacity (“NQC”) for all resources because the California Public Utilities Commission (“CPUC”) calculates the official NQC value. Additionally, in Line 1 (Peak Load Forecast), SCE plans to provide a managed forecast, which includes both committed and uncommitted energy efficiency. Corresponding zeros will be included in Line 3 (Uncommitted Energy Efficiency).

SCE would like to work with the Energy Commission to address reporting for the renewable energy contracts. Given the large number of these contracts (approximately 200) and the level of detail of the information requested, the burden of including the information as required on Forms S-1, S-2, S-4, and S-5 is unnecessarily burdensome. Moreover, SCE understands that the Energy Commission wants to add the information provided by SCE in these forms to the information provided by other load serving entities in order to arrive at an overall California-wide perspective. SCE is concerned that it may not be accurate to simply aggregate this information. Accordingly, SCE requests that the Energy Commission describe the intended use for this data, so that SCE can provide the information in the most useful format to meet the Energy Commission’s needs. We would like to jointly discuss the

issue and develop a solution that provides the appropriate information in a manageable fashion.

As always, SCE appreciates the accommodations the Energy Commission has made in this and past IEPR proceedings to facilitate our participation. SCE appreciates having the opportunity to submit comments to the Workshop and to work with the Energy Commission to resolve outstanding issues. Feel free to contact me regarding any questions or concerns.

Sincerely,

/s/ Manuel Alvarez
Manuel Alvarez, Manager
Regulatory Policy and Affairs
Southern California Edison Company
1201 K Street, Ste. 735
Sacramento, California 95814
(916) 441-2369