



SOUTHERN CALIFORNIA
EDISON

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California Energy Commission

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TN # 67369

SEP 28 2012

September 28, 2012

California Energy Commission
Docket Office, MS-4
Attn: Docket No. 12-OIR-1
1516 Ninth Street
Sacramento, CA 95814-5512

Dear Commission:

Re: Southern California Edison's Comments on the Rulemaking to Consider Modification of Regulations Establishing a Greenhouse Gases Emission Performance Standard For Baseload Generation of Local Publicly Owned Electric Utilities

On August 31, 2012, the Energy Commission released a request for comments in the rulemaking: Rulemaking to Consider Modification of Regulations Establishing a Greenhouse Gases Emission Performance Standard for Baseload Generation of Local Publicly Owned Electric Utilities.

While the majority of the issues discussed relate to Public Owned Utilities and not Investor Owned Utilities, there is one issue that Southern California Edison (SCE) would like to comment. A suggestion was made for the Energy Commission to consider reducing the Emission Performance Standard from 1100 pounds of carbon dioxide per megawatt hour of electricity to 825-850 lbs/MWH. It is this issue that merits some consideration. From the original scope of the rulemaking it would appear that changing the current standard is outside the original scope of the Energy Commission's Rulemaking. For this reason, SCE suggests that this issue not be considered as part of the current rulemaking. Other parties and regulatory agencies who may not be participating in this current rulemaking have an interest and requirement to evaluate the implications of a change in the Emission Performance Standard.

If you have any questions, please call me at (916) 441-2368.

Sincerely,

Manuel Alvarez

cc: Robert B. Weisenmiller, Chair
Sekita Grant, Advisor to Chair Weisenmiller