

December 28, 2011

VIA E-MAIL

Edward Randolph, Director
Energy Division
California Public Utilities Commission
505 Van Ness Avenue, Room 4004
San Francisco, CA 94102

Re: Southern California Edison Company Advice 2670-E; Modification of WATER and CREST Tariffs and Contracts for Purchase of Eligible Renewable Generation From Small Renewable Generators to Reflect the 2011 Market Price Referent

Dear Mr. Randolph:

By way of this letter, the Solar Alliance responds to the above referenced advice letter filing of Southern California Edison Company (SCE) regarding modification of its WATER and CREST Tariffs and Contracts to reflect the 2011 Market Price Referent (MPR). SCE's advice filing was made pursuant to Ordering Paragraph No. 2 of Commission Resolution E-4442 which directed such filing and provided that the "advice letter will have an effective date of January 3, 2012."

While SCE's filing appears to be compliant with the Commission's directive,¹ its actual application of such directive is not. It has come to the Solar Alliance's attention that it is SCE's intent to retroactively insert the 2011 MPR into contracts which have already been executed under its WATER and CREST tariffs, but are currently waiting in the interconnection queue. The Solar Alliance submits that such action is not consistent with the Commission directive that the advice filing implementing the 2011 MPR have an effective date of January 3, 2012. Accordingly, the Commission should clarify that SCE may only use the adopted 2011 MPR in contracts executed pursuant to its CREST or WATER tariffs subsequent to January 2, 2012.

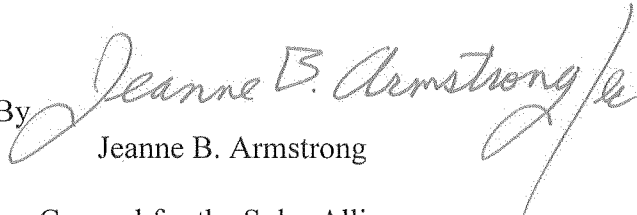
¹ At page 3 of the Advice Filing SCE provides "Pursuant to Resolution E-4442, Ordering Paragraph 2, this advice letter is effective January 3, 2012."

Edward Randolph, Director
December 28, 2011
Page 2

Thank you for your prompt attention to this matter.

Very truly yours,

GOODIN, MACBRIDE, SQUERI,
DAY & LAMPREY, LLP

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