

# Comments of Southern California Edison: Failure to Comply

Southern California Edison (SCE) appreciates the opportunity to comment on Failure to Comply Version 8, Business Practice. If you have any questions, please contact: John Zoida, (626)302-3336, [john.zoida@sce.com](mailto:john.zoida@sce.com)

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## B. 4. a. Calculating the Failure to Comply Billing Factor

Comments: Moving from a 1 minute interval to a 2 second interval is a positive step, however SCE recommends increasing interval to 5 minutes or having a tolerance band of the lesser of 5% of schedules or 5MW. In the current construct, there is a conflict between FTC and PDP/Generation Imbalance charges (i.e. To avoid the possibility of generating over the FTC limit for a small instance/MW quantity, generators are incented to under-generate during a Dispatch Order).