



Comments of Pacific Gas & Electric Company

Market Settlement timeline –
Straw Proposal/Issue Paper Workshop

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company (PG&E) offers the following comments on the California Independent System Operator’s (CAISO) Market Settlement timeline Straw Proposal/Issue Paper, released on June 11th, 2019.

PG&E thanks the CAISO for initiating this process to streamline the existing Market Settlement timeline and are generally supportive of the CAISO’s proposal. We do have some items of concern however and feel that several areas will need a more in-depth examination given the financial complexity of the proposed changes and potential impacts to market participants.

PG&E’s first, and most pressing concern, is the proposal to only consider settlement disputes for disputed revenues or charges greater than \$100.00, unless the dispute is an approved place-holder dispute. PG&E believes that it is the CAISO’s obligation to provide accurate settlement statements to all participants and that any minimum dispute threshold restriction is inappropriate and should be removed from this (and future) initiatives.

Regarding the proposed dispute process, PG&E also requests that the dispute deadlines for the proposed T+7B and T+60B statements be revised to 22 business days and 30 business days, respectively. While the loss of the current T+3B Initial statement would seem to provide some financial benefit, it also removes several days of time wherein market participants can review and analyze data in preparation for possible disputes. We also believe that this additional time, both on the T+7B and T+60B statements, will allow the market participants to better review and understand the data provided and should result in fewer invalid disputes.

Lastly, PG&E requests that the CAISO provide more information on how the proposed timeline change would impact the weekly invoice and EAL processes. The changes being proposed represent a considerable impact to market participant processes, and we believe that more information is needed in order for stakeholders to properly evaluate and prepare for the resulting financial and procedural impacts.