



Comments of Pacific Gas and Electric Company

Subject: Natural Gas Pipeline Coordination Tariff Modifications

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company (PG&E) appreciates the opportunity to submit comments on the California Independent System Operator Corporation's (ISO) *Natural Gas Pipeline Coordination Tariff Modifications* (Tariff Modifications), posted September 14, 2011. PG&E supports the ISO's proposed Tariff Modifications where the ISO may share certain information with natural gas transmission and distribution utilities, including PG&E.

As the ISO is aware, PG&E's gas transmission and distribution business is regulated primarily by the California Public Utilities Commission (CPUC). Therefore, even if the ISO were to obtain approval from the Federal Energy Regulatory Commission (FERC) allowing the ISO to share information with PG&E, PG&E would still be obligated to abide by PG&E's CPUC-jurisdictional gas tariffs, including curtailment and information sharing procedures set forth therein. In particular, Gas Rule 14 governs gas curtailment on PG&E's gas system, and Gas Rule 26 governs information sharing between PG&E's gas transmission and distribution organizations, and intra-company departments (e.g., PG&E's Power Generation department). Notwithstanding information provided by the ISO, PG&E will take whatever steps it determines are appropriate to operate its gas system.

If FERC approves the ISO's Tariff Modifications, PG&E commits to working with the ISO in developing an appropriate non-disclosure agreement and non-disclosure statement. Consistent with the objective of maintaining the continued reliable operation of the electric grid, PG&E will incorporate information the ISO may share with PG&E into the management of its gas transmission system, subject to the caveats listed above.