

Comments of Pacific Gas and Electric Company on Annual Policy Initiatives Roadmap Straw Proposal

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on CAISO's Annual Policy Initiatives Roadmap Process Straw Proposal.

PG&E supports CAISO's proposed changes to its annual roadmap development and process enhancements for updating the Policy Initiatives Catalog. These include updating the Policy Initiatives Catalog twice a year, eliminating numerical ranking for discretionary initiatives, and providing a threeyear policy development roadmap. PG&E offers the following comments:

- 1. PG&E requests CAISO provide additional clarity on timelines for submitting and commenting on stakeholder-submitted initiative proposals, particularly how far in advance stakeholder submissions should take place in order for them to be considered in the bi-annual catalog update.
- 2. PG&E supports CAISO providing a detailed rationale for selecting final initiatives including costbenefit analyses and implementation considerations¹. These considerations are especially important to PG&E for understanding the level of resources needed to support various initiatives, not just from CAISO staff, but for PG&E internally. PG&E also suggests the CAISO rationale include what stakeholders have advocated for proposed initiatives ultimately selected by CAISO.

¹ "Annual Policy Initiatives Roadmap Process Straw Proposal". California ISO. Page 5. <u>http://www.caiso.com/Documents/StrawProposal-AnnualPolicyInitiativesRoadmapProcess.pdf</u>