

Pacific Gas and Electric Company Stakeholder Comments

Submitted by	Company	Date Submitted
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PG&E appreciates the opportunity to comment on the CAISO's revised straw proposal of April 26th, 2016. PG&E appreciates the CAISO's recognition and focus on maintaining the accuracy and integrity of meter data.

Please provide your comments on the four areas of the revised straw proposal listed below.

- (1) Provide existing metered entities the option to retain current requirements and maintain their status quo, or instead to opt for (2) and (3). The ISO invites stakeholders to comment on this element of its proposal and indicate where additional clarification may be needed.

PG&E supports the CAISO's proposal to allow existing metered entities to maintain their current status. That is, ISOMEs will be able to maintain their status inclusive of any exemptions they may have obtained, without requiring these metered entities to switch to being a SCME and triggering the need for a SQMD Plan. PG&E also encourages the CAISO to continue to work with new resource owners, where appropriate, and grant exemptions for resources that choose to be an ISOME.

- (2) Allow scheduling coordinators the option to submit settlement quality meter data (SQMD) for scheduling coordinator metered entity (SCME) resources represented. The ISO invites stakeholders to comment on this element of its proposal and indicate where additional clarification may be needed.

PG&E does not have a comment on this topic.

- (3) Require submittal of a SQMD Plan by scheduling coordinators opting to submit SQMD for SCME resources represented. A draft SQMD Plan was attached to the revised straw proposal. Topics addressed in the draft SQMD Plan include: responsibility, agreements, market participation, quality assurance, audits, and

corrective actions. The ISO invites stakeholders to comment on the draft. The ISO is particularly interested in whether the draft SQMD Plan captures all relevant topics.

PG&E supports the CAISO requiring a Professional Engineering (PE) stamp of approval for supporting documentation in the SQMD plan.

Post SQMD Plan implementation, PG&E recommends that the CAISO include criteria and instructions on when a SCME needs to submit or update the SQMD Plan.

- (4) Modifications to ISO metered entity (ISOME) requirements. Tariff section 10.2.6 requires revenue quality meter data (RQMD) be provided to the ISO directly; however, the ISO may exempt an entity from this requirement if installation of communication links is unnecessary, impracticable or uneconomic. The ISO proposes to allow communication of meter data via any available method provided appropriate security and/or encryption of the data exists and is verified to be in place for the method chosen. The ISO invites stakeholders to comment on this element of its proposal and indicate where additional clarification may be needed.

PG&E does not have a comment on this topic.

Other comments

Please provide any comments not associated with the four topics above.

PG&E appreciates the CAISO's clear emphasis on and commitment to maintain the accuracy and integrity of meter data, in addition to current existing controls such as self-audits and meter testing. PG&E similarly recognizes these as critical components to the integrity of the market. PG&E recommends the CAISO provide further guidelines on when and how the CAISO will trigger an audit.