Comments of Pacific Gas and Electric Company Local Market Power Mitigation (LMPM) Enhancement Straw Proposal

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) Local Market Power Mitigation (LMPM) Enhancement January 12th Final Proposal. PG&E supports CAISO having proper tools and capability to mitigate market power. PG&E believes CAISO's proposal will improve the accuracy of the existing tool.

PG&E wants to be sure that the LMPM enhancement functions properly on execution and that a back-up plan is in place, in case unforeseen issues arise. We appreciate CAISO confidence in the vendor's ability to implement the tool. PG&E wants to make sure that expedited implementation and deployment of the tool should include the ability to perform a parallel execution of the original LMPM tool. This original tool should be utilized, in case the enhancement fails to execute successfully.