



## Comments of Pacific Gas and Electric Company

### Subject: Tariff Clarifications Filing Revised Draft Tariff Language

Submitted by	Company	Date Submitted
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PG&E appreciates the opportunity to review the proposed Tariff clarifications and provides these brief comments in the following sections:

#### **Section 11.19.1.2:**

PG&E seeks clarification as to the meaning of the phrase “at least twice a month settlement statements.” PG&E understands it to mean that regardless of FERC invoicing frequency, settlement statement charges would appear at least twice a month. This is because an invoice can contain at least two billing periods with FERC charges.

#### **Section 11.20.5:**

PG&E suggests that the CAISO change “preliminary” to “initial”, and “final” to “Recalc” to be consistent with MRTU terminology.

#### **Section 11.20.7.3:**

PG&E suggests that the CAISO change “preliminary” to “initial”, and “final” to “Recalc” to be consistent with MRTU terminology.

#### **Section 22.11.1**

While PG&E doesn't take issue with any of the changes in this section, we do believe, in principal, that the Tariff should govern the language of the BPMs and not vice versa. Therefore, using changes to the BPMs as the main justification for making conforming changes to the Tariff is inappropriate. Substantive changes to the Tariff should come through the stakeholder process and not through the BPM change process.

#### **Section 25.1**

The proposed change effectively expands the range of entities with requirements under this section, however, it is unclear (based on the justification given) what gap this change is meant to address. PG&E would like clarification as to what requirements the CAISO feels are not being met under the Tariff as currently written.

## PG&E Comments on November 11, 2010 Revised Draft Tariff Language

### **Section 30.5.2.1**

The changes to this section introduce two new Capitalized Terms: Resource Name and Location Name. As such, PG&E recommends that CAISO create Defined Terms for each of these in Appendix A.

### **Section 30.7.3.1 and Section 30.7.6.1**

The changes in these sections include a reference to Section 40.6.8 that adds confusion and should be deleted or modified.

In Section 40.6.8 the proposed language is:

*The CAISO will not insert or extend any Bid for Regulation Up or Regulation Down in the Real Time Market for a Use-Limited Resource. The CAISO will not insert or extend a Spinning Reserve and Non-Spinning Reserve Bid in the Real-Time Market for a Resource Adequacy Resource that is a Use-Limited Resource unless the resource submits an Energy Bid and fails to submit an Ancillary Services Bid.*

In Sections 30.7.3.1 and 30.7.6.1, the ISO proposes:

*The CAISO will not insert or extend any Bid for Regulation Up or Regulation Down in the Real Time Market for a Use-Limited Resource except as provided in Section 40.6.8. The CAISO will not insert or extend a Spinning Reserve and Non-Spinning Reserve Ancillary Services Bid at \$0 in the Real-Time Market for any certified Operating Reserve capacity of a resource unless that resource submits an Energy Bid and fails to submit an Ancillary Services Bid.*

PG&E suggests that the phrase: "except as provided in Section 40.6.8" be deleted so that the sections parallel section 40.6.8 correctly (i.e. section 40.6.8 doesn't allow for modification of bids for Regulation Up or Regulation Down for a Use-Limited Resource either).

With respect to Spinning and Non-spinning Reserves, PG&E suggests that the ISO either parallel word for word the language in 40.6.8, or reference it to reduce confusion.

### **Section 37.8.10 and Section 37.11.1:**

While PG&E would like to make substantive comments on elements of these sections, we believe that this is not the right forum to do so, and look forward to the opportunity to provide these comments in a future stakeholder process focused on the Method For Calculating Inaccurate Meter Data Penalty, as well as other provisions relating to Rules of Conduct. .

### **Appendix A – Definition of WSCC**

The deletion of the definition of WSCC is tied to a yet-to-occur event. It appears to be premature. This change should be conditioned on the occurrence of the event (i.e. the termination of the CAISO's RMS agreement with WECC).

### **Appendix F, Schedule 3; changes related to the Transition Period:**

PG&E understands that the Transition Period ends as of the end of 2010, at which point much of Appendix F, Schedule 3 will become out-of-date. Therefore, there may be further opportunities for clarifying changes related to the end of the Transition Period.