



## Stakeholder Comments Template

### Intertie Deviation Settlement: Draft Final Proposal

This template has been created for submission of stakeholder comments on the Intertie Deviation Settlement Draft Final Proposal that was published on December 13, 2018. The Intertie Deviation Settlement Draft Final Proposal stakeholder meeting presentation, and other information related to this initiative may be found on the initiative webpage at: <http://www.caiso.com/informed/Pages/StakeholderProcesses/IntertieDeviationSettlement.aspx>

Submitted by	Organization	Date Submitted
Wini Chen 415-973-8801	Pacific Gas and Electric Company	January 8, 2019

Upon completion of this template, please submit it to [initiativecomments@caiso.com](mailto:initiativecomments@caiso.com).

Submissions are requested by close of business on **January 8, 2019**.

#### Please provide your organization's comments on the following topics:

1. Curtailed E-Tags will be excluded from the under/over delivery charge, which allows for removal of the 10% threshold.

[Pacific Gas and Electric Company \(PG&E\) has no additional comments on this topic.](#)

2. The under/over delivery charge will be evaluated in each fifteen-minute interval as opposed to the decline charge, which is applied on a monthly basis.

[PG&E has no additional comments on this topic.](#)

3. The logic for the 15-minute market (FMM) will be based on the submission of an E-Tag transmission profile instead of the assumption that an E-Tag will be submitted.

[PG&E has no additional comments on this topic.](#)

4. Declined and undelivered energy will be subject to the under/over delivery charge =  $0.5 \times \text{MAX}(\text{FMM LMP}, \text{RTD LMP})$ , with a \$10/MWh minimum

PG&E has no additional comments on this topic.

### Additional comments

Please offer any other feedback your organization would like to provide on the Intertie Deviation Settlement Draft Final Proposal.

PG&E respectfully offers the following comments on the California Independent System Operator's (CAISO) Intertie Deviation Settlement - Draft Final Proposal, published on December 12, 2018 and discussed at the stakeholder call on December 19, 2018:

PG&E supports the CAISO in its efforts to provide more accurate estimates of the net scheduled interchange, increased grid reliability, and accurate market pricing.

PG&E supports the implementation of financial incentives to ensure the delivery of day-ahead or hourly real-time energy awards on interties.

PG&E requests that the CAISO provide additional clarity on the "market award" language. The draft final proposal often refers to "market award" without specifying which market award it refers to. PG&E understands that the CAISO sometimes uses "market award" to refer to hour-ahead scheduling process (HASP) schedule award which is misleading since the HASP is not a market.