

PG&E Comments

Data Release Phase 1 Draft Tariff Language

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Pacific Gas & Electric (PG&E) appreciates the opportunity to participate in the stakeholder process for CAISO’s Data Release Phase One Initiative and to submit comments regarding the March 12, 2010 Draft Tariff Language.

Our comments focus on two separate concerns. First, we address what we see as minor inconsistencies between section 6.5.3.3 and the Board approved Draft Final Proposal. Next, we seek the CAISO’s response on three policy issues not currently addressed in the Draft Tariff Language.

Tariff Section 6.5.3.3

The first sentence in this section states that the "enforced" data tables will be published *after* the market results are posted. However, the Draft Final Proposal states they will be published *simultaneous* with the market results.

A similar timing inconsistency appears in the second sentence. Here, the language simply states that the "planned enforced" tables will be published *prior* to the next day-ahead market, but makes no specific reference to time or events. The Draft Final Proposal stated that this data would be published by 1800 hours the day previous to the close of the market. We suggest a tariff reference to 1800 hours be added, similar to the Proposal.

Policy Topics Not Included in the tariff

PG&E seeks clarity on three specific policy points arrived at through the stakeholder process that do not seem to be addressed in the Draft Tariff language.

First, we believe the CAISO’s commitment to release a monthly Conforming Report should be represented in the proposed tariff language. The specifics of the report can be detailed in the BPMs, but PG&E suggests the CAISO include tariff language regarding CAISO's obligation to produce the report.

Second, it is unclear to us how the CAISO intends to memorialize its commitment to give 10-days advance notice to market participants whenever a new transmission constraint is added to the Full Network Model (FNM). It may be sufficient for this provision to only

appear in the BPM, but PG&E asks the CAISO to clarify how this commitment will be documented.

Lastly, we seek confirmation that the CAISO intends to publish nomogram limits in the CRR FNM. It was our understanding from the stakeholder process that the CAISO would consider publishing the nomograms limits, similar to the transmission line limits. PG&E asks the CAISO for confirmation and to specify how this commitment should best be documented.