Comments of Pacific Gas & Electric Company
Real-Time Market Neutrality Settlements –
Straw Proposal/Issue Paper

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) Real-Time Market Neutrality Settlement straw proposal.

PG&E thanks the CAISO for the introduction to this concern over the appropriate allocation of real-time neutrality charges. We think the proposal may have merit, however, there are several considerations and details both in process and content that we believe need to be addressed.

For PG&E to fully understand this initiative the CAISO needs to clearly outline the issues that it is seeking to resolve. Rapid updates and multiple iterations of the issue paper did not help foundational understanding of the problems the CAISO identified and sought to address. Furthermore, the simple examples provided in the issue paper do not provide enough variety of scenarios to fully consider the impacts that the change to real-time neutrality settlements would have.

Given the lack of clarity provided by the straw proposal, PG&E is concerned with the expedited schedule that is being proposed for the completion of this initiative. Any changes to the CAISO tariff and the settlements process must be properly considered, vetted, and implements to avoid any unexpected consequences.

PG&E looks forward to the CAISO providing more detailed examples and breadth on the subject in a revised straw proposal of the initiative. We think there were legitimate concerns from stakeholders May 1st call that should be addressed in a revised proposal. We hope that a revised straw proposal will clarify the issues both at the CAISO and for stakeholders so that all parties have a clear understanding of the initiative and also have sufficient time to consider all the factors and impacts of such a change to the settlements process.