

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Application of Pacific Gas and Electric
Company for Approval of 2013 – 2014
Statewide Marketing, Education, and
Outreach Program and Budget (U39M)

And Related Matters

Application 12-08-007
(filed August 3, 2012)

Application 12-08-008
Application 12-08-009
Application 12-08-010
(Filed August 3, 2012)

**COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION**

Pursuant to Rule 14.3 of the Commission’s Rules of Practice and Procedure, the California Independent System Operator Corporation (CAISO) hereby files comments in response to the *Proposed Decision Authorizing Southern California Gas Company to Provide Up To \$11 Million For Aliso Canyon-Related Messaging* (Proposed Decision). The Proposed Decision directs Southern California Gas Company (SoCalGas) to provide additional funding for marketing, education, and outreach activities, including the CAISO’s Flex Alert program, to reduce the risk of natural gas and electricity curtailments in the Los Angeles area in 2017.

The CAISO generally supports the Proposed Decision’s authorization for additional funding to support the Flex Alert program. At this time the CAISO’s comments are limited to one small, but important correction regarding the funding for the Flex Alert program. Currently, the Proposed Decision states that “Five million dollars should be provided to the CAISO for Flex Alerts.”¹ This statement mischaracterizes the relationship between SoCalGas and CAISO, as no funding should be directly transferred to the CAISO for the Flex Alert program. This sentence should be clarified to indicate that SoCalGas will independently provide additional funding to support the Flex Alert paid advertising campaign.²

¹ Proposed Decision, p. 15.

² This language is consistent with other portions of the Proposed Decision. See Conclusion of Law No. 3, p. 19 (“SoCalGas should provide \$5 million in funding to support paid Flex Alert advertising by the CAISO in 2017.”)

The CAISO merely administers the Flex Alert program by calling Flex Alert events when necessary for grid reliability. The CAISO does not receive funding for its activities. In 2016, SoCalGas independently funded paid advertisements for the Flex Alert program consistent with the Commission's directives. This relationship should continue in 2017 because the CAISO is not in a position to accept funding for the paid advertising portion of the Flex Alert program.

Respectfully submitted,

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Dated: May 2, 2017