

STATEMENT OF PG&E

PG&E supports adding the CAISO's proposed grandfathering provision to the 2012 GMC rate design straw proposal. By exempting generating units that meet a set of limited, specific criteria from the proposed MWh-based System Operations charge, the CAISO has addressed the concerns expressed by certain Stakeholders without broadly departing from its cost-based rate design principles. PG&E understands that, by proposing the grandfathering compromise, the CAISO seeks to limit or eliminate the issues FERC must resolve when the CAISO makes its 2012 GMC filing, and PG&E supports this aim.

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