



## Comments of Pacific Gas and Electric Company

### Subject: Tariff Clarifications Filing Revised Draft Tariff Language

Submitted by	Company	Date Submitted
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PG&E appreciates the opportunity to further review the revised draft Tariff Language and provides these brief reply comments for the following sections:

#### **Section 22.11.1**

PG&E would like to reiterate its concern that the BPMs at times do not conform to the Tariff. While we appreciate that the CAISO has chosen to withdraw its proposed amendment to this section based on stakeholder comments, we remain concerned that there may be additional instances where the BPMs have been changed before a necessary change to the Tariff has been adopted, and encourage CAISO staff to identify any such instances and share them with stakeholders if they exist.

#### **Section 37.8.10:**

PG&E would like to encourage the ISO to maintain the dispute deadline for Sanctions assessed under this section at T+38B and not change it to T+7B. Prior to Payment Acceleration, initial statements were published at T+38B. Maintaining the T+38B deadline in Payment Acceleration is consistent with PG&E's goal of focusing disputes at recal T+38B when all actual meter data is included for the first time.