



# Comments of Pacific Gas and Electric Company

## RTIEO Draft Tariff Language

Submitted by		Company	Date Submitted
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Pacific Gas & Electric (PG&E) appreciates the opportunity to participate in the stakeholder process for the California Independent System Operator's (CAISO) Real-Time Imbalance Energy Offset (RTIEO) initiative and to submit comments on the August 19, 2011 Draft Tariff Language.

PG&E fully supports the CAISO's decision to eliminate the interties as eligible convergence bidding nodes. We believe that the proposed Draft Tariff Language makes the needed changes to accomplish this goal and do not propose any changes to the draft language. PG&E encourages the CAISO to file the tariff changes with FERC as soon as possible.

During the interim period it is essential that the position limits for convergence bidding at the interties not be increased from 5% to 25% as planned on October 1. We strongly encourage the CAISO to take all necessary steps to ensure the position limits remain at the current 5% level until the interties are removed as eligible convergence bidding nodes.