

Comments of Pacific Gas and Electric Company Tariff Clarifications Filing Process

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company (PG&E) appreciates the opportunity to participate in the California Independent System Operator's (CAISO) Tariff Clarifications Filing Process and to submit comments on the revised draft tariff language and the companion matrix of tariff changes. PG&E's comments are provided in the table below.

Section	Description of Change	PG&E's Comment
22.10	Add new section entitled Administrative Fees to clarify that the ISO may charge an administrative fee to recover the costs of providing archived Invoices and Settlement Statements to a market participant requesting copies of its own information and the market participant requesting the information shall pay the fee. Tariff section should read as follows: The CAISO may charge a Market Participant requesting archived copies of its own Settlement Statements or Invoices an administrative fee for providing copies of the Settlement Statements or Invoices. The administrative fee for each request shall be \$200 per Settlement Statement or Invoice for the first two copies and \$50 for each additional copy.	With respect to those Settlement Statements and Invoices for which PG&E is responsible as the relevant scheduling coordinator, PG&E does not interpret the proposed tariff changes, including the new Section 22.10, as providing other entities with access to those Settlement Statements and Invoices. If PG&E is wrong, and the intent is to provide access to other parties by payment of an administration fee, then those changes should not be included in the upcoming filing at FERC.
Appendix A	Add a new defined term Interim Deliverability Status to read as follows "An interim designation that allows an Interconnection Customer that has requested Full or Partial Capacity Deliverability Status to provide Net Qualifying Capacity as determined annually by the CAISO pursuant to the provisions of the CAISO Tariff and the applicable Business Practice Manual pending the in-service date of all the required Network Upgrades specified in the Interconnection Customer's Generator Interconnection Agreement or identified in its Phase II Interconnection Study report or Facility Study report."	PG&E appreciates the CAISO adding this new defined term to Appendix A, as requested in our January 22, 2013 comments.