



Comments of Pacific Gas & Electric Company Market Settlement Timeline – Draft Final Proposal and Workshop

Submitted by	Company	Date Submitted
Joshua Arnold (415-973-1273)	Pacific Gas & Electric	October 10, 2019

Pacific Gas and Electric Company (PG&E) offers the following comments on the California Independent System Operator’s (CAISO) Market Settlement timeline Draft Final Proposal, released on September 23rd, 2019.

In this Draft Final Proposal, the CAISO has proposed one additional adjustment to the suggested publication timelines for optional statements. Initial meter submissions are still proposed to be at T+7B with the corresponding Initial Statements will be published on T+9B. The final required statements would then be published on T+70B, following a T+52B final meter submission deadline. Optional market statements are now proposed for T+11M, T+21M, and T+24M, instead of the T+12M, T+21M, and T+24M statement timelines proposed in the Initial Straw Proposal. Market participants can submit disputes to the new settlement statements 22 business days after the CAISO publishes each statement, except for the final T+24M iteration which cannot be disputed.

PG&E fully supports this proposed meter data, settlement publication, and dispute resolution timeline. We think that this final proposal is both reasonable and worthwhile; and thank the CAISO for their diligence in incorporating stakeholders concerns during this initiative process.

PG&E also appreciates the CAISO’s work in estimating the impacts on participant EAL and credit positions resulting from these proposed changes. After reviewing the CAISO’s findings, we agree that the minimal impacts seen in this evaluation remove the need for any additional statements, as had been suggested earlier.

Lastly, PG&E supports the CAISO in removing the \$100 minimum dispute threshold from this proposal.