

Biedler, Gillian

From: Bogy, John W (Law) [JOB5@pge.com]
Sent: Monday, February 12, 2007 2:34 PM
To: Biedler, Gillian
Cc: Bogy, John W (Law)

Attached please find PG&E's comments on the CAISO's proposed Recommended Modifications to Amendment 72 to its tariff, posted on or about January 12. This does not respond to the document posted in February. I'm personally sorry I was unable to make the call this morning, which was Lincoln's birthday. Thank you very much for your assistance, and don't hesitate to call me. John Bogy (415) (973-8302)

1. Section 4.5.4.2.1.1 - "Day-Ahead Schedule" is not specific. The CAISO needs to specify which Day-Ahead Schedule will be used to enforce compliance.
2. Section 4.5.4.2.1.3 - Reference is made to "minor deviations". The term "minor deviations" is described in Section 4.5.4.2.1.4. PG&E believes that makes it a defined term, which should be capitalized throughout the Tariff.
3. No reference is made to allow the CAISO to relax the constraints due to operational concerns. A section needs to be added to allow for unpredictable operational issues.
4. Section 19.1.5 - There is no requirement for the CAISO to acknowledge receipt of the demand forecast. This may result in entities believing that they have complied only to find out later that their forecasts were not received by the CAISO or sent by the load serving entity. There needs to be a commitment by the CAISO to have something in place that allows the load serving entity to know that it has successfully submitted a forecast.