



Comments of Pacific Gas & Electric Company

PRR #1217 - Clarification of Congestion Revenue Rights Processes 2019

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company (PG&E) provides the following comments on the California Independent System Operator (CAISO) PRR #1217.

1. Version 25 appears to reference the wrong PRR number.

In the Revision History of the CRR BPM, CAISO appears to attribute revisions associated with PRR #1217 to PRR #1138 in Version 25. PG&E also questions whether the revision date of 2/12/2019 is correct and appropriate

2. Difference between AEE and LSE

Unrelated to the PRR #1217 revisions, PG&E asks for clarification between the terms Allocation Eligible Entity (AEE) and Load Serving Entity (LSE). PG&E cannot find a definition of AEE in the BPM for Definitions and Acronyms. PG&E asks if (within the context of the CRR allocation processes) an LSE cannot be an AEE. PG&E's understanding is that all LSEs participating in the CRR process are also AEEs except for certain Out of Balancing Area Load Serving Entities (OBALSE). What is the significance of distinguishing between LSE and AEE in the CRR BPM?