

PG&E requests that the CAISO resolve the following inconsistencies between the Export, Load, and Wheeling Priorities Final Proposal and the proposed BPM language in PRR 1360:

- The CAISO clarified in its [Final Proposal](#) (pg. 19) “that only generating resources can be a designated resource.” However, in the PRR 1360 language, it is indicated that “the designated resource must be a generating resource or a non-generator resource...” (2.5.5.2.1). PG&E requests that the CAISO explicitly clarify in the BPM that only generating resources can support a PT export as is consistent with the Board-approved Final Proposal.
- In the Final Proposal and in the Tariff language submitted to FERC, the CAISO specified that the “Priority Wheeling Through pro rata share for each Self-Schedule will be based on the lowest of (1) 110 percent of the submitted Day-Ahead Market Self-Schedule of the Priority Wheeling Through transaction, (2) the submitted Real-Time Market Self-Schedule of the Priority Wheeling Through transaction, or (3) the Priority Wheeling Through quantity requested 45-days in advance of the month.” (Proposed Tariff Section 34.12.3). However, PRR 1360 does not mention these limitations when detailing the pro rata transmission capacity allocation process. PG&E requests that the CAISO include this language within the BPM to clarify that it will limit the wheel through pro rata allocation as described in the Tariff.