PG&E shares the concern raised by SCE in their recommendation comments, submitted on 7/15/2022, about the application of a sanction per resource. With over 60 resources in its portfolio, a late submission of CBL and/or BASE data would expose PG&E to an excessive penalty of over $60,000 per trade day. On that basis, PG&E opposes PRR #1444 and respectfully requests that the CAISO provide clarification on how the sanctions will be applied.