



## **Comments of Pacific Gas and Electric Company on the GHG Emission Tracking Report ‘Frequently Asked Questions’ Document**

<b>Submitted by</b>	<b>Company</b>	<b>Date Submitted</b>
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The Energy Imbalance Market (EIM) provides a variety of benefits to its participants, electricity customers, and the environment. Pacific Gas and Electric Company (PG&E) appreciates the recent effort by the California Independent System Operator (CAISO) to better understand how the EIM might impact greenhouse gas (GHG) emissions, and looks forward to the regular release of GHG emissions tracking reports.

Prior to developing the next report, PG&E requests that the CAISO clarify the process used to determine counterfactual scenarios and then to compare those scenarios to EIM dispatch outcomes. As PG&E understands the CAISO methodology, the counterfactual is based on dispatch results if each EIM Entity served its load using internal resources. When comparing that scenario to results of running the EIM, it is not clear how the CAISO differentiates between a change in dispatch in an EIM Entity to serve California load or load in another EIM Entity. Additional insight into the methodology for developing and using counterfactuals will make the CAISO analysis more robust and valuable.