

## Convergence Bidding

- ffi PG&E supports the proposed decision with certain critical modifications
  
- ffi Clarify in ordering paragraph that IOUs are not required to use any of the three strategies and they have flexibility to apply them to meet own circumstances
  
- ffi **Eliminate after-the-fact reasonableness reviews for defensive bidding strategies**
  - Allow IOUs to pursue defensive bidding after 24-hour notice of strategy to PRG and Energy Division
  
  - Limit use of defensive bidding strategy to 15 days, or until authority is revoked by the Director of Energy Division, whichever is earlier
  
- ffi Eliminate hard stop loss limit ---- a loss limit notification is acceptable alternative
  
- ffi Expand Strategy 1 to include load nodes, inerties and long-start resources
  - Do not limit bidding to nodes or locations where IOU resources located