PG&E comments:

PG&E appreciates the opportunity to provide comments in response to PRR 1114 (*Outage coordination changes due to reliability coordinator service*):

1. Section 3.2 Outage States à PG&E recommends to add verbiage surrounding the assessment of Planned Outage Substitution Obligation to the description of the “Approve” and “Denied” states.

i. An outage is “approved” when it is accepted by ISO. For resources with an RA obligation, CAISO has determined No Planned Outage Substitution Obligation

(POSO).

ii. An outage is “denied” when it is not accepted by the ISO due to System

Reliability. For resources with an RA obligation, CAISO has identified that substitution requirements were not met via Planned Outage Substitution

Obligation (POSO).

*ISO comments: The Planned Outage Substitution Obligation (POSO) is explained in detail in the RR BPM and therefore doesn’t have an in-depth mention of the process in the Outage Coordination BPM. Please refer to the RR BPM for more information about assessment of Planned Outage Substitution Obligation.*

1. Section 8.7.2 Outages Cancelled/Disapproved à section needs modification as the ISO state of “Disapproved” is being revised to “Denied”.

*ISO comments: Noted, the verbiage will be updated accordingly.*