

## Comments of Pacific Gas & Electric Company PRR1139

Pacific Gas and Electric Company (PG&E) offers the following comments on the California Independent System Operator's (CAISO) PRR1139, regarding proposed changes to the BPM for Outage Management.

Submitted by	Company	Date Submitted
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### Section 3.4 Nature of Work Attributes for Generation Outages

The CAISO should not remove the language “Non-temperature related unit availability derate that is outside the control of the plant operator” from the Ambient Not Due to Temp outage card. While other changes to PRR1139 are related to newly implemented language from the CCE3 initiative, this modification has no such association and changes the meaning of the outage card substantially. Since these changes relate to previous PRRs 1088 and 1017, PG&E agrees with comments made by Southern California Edison (SCE)<sup>1</sup>. The CAISO has not yet resolved PG&E and SCE's outstanding concerns.

Additionally, PG&E recommends the Ambient Not Due to Temp Purpose to include a description for Water Management that provides notification of physical limitation of hydro resources due to lack of water or lack of head.

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<sup>1</sup> Stakeholder comments on Proposed Revision Request 1088:  
<https://bpmcm.caiso.com/Lists/PRR%20Comments/Attachments/1604/SCE%20Initial%20Comments%20PRR%201088.pdf>