

## Comments of Pacific Gas & Electric Company

### PRR1140

Pacific Gas and Electric Company (PG&E) offers the following comments on the California Independent System Operator's (CAISO) PRR1140, regarding proposed changes to the BPM for Reliability Requirements.

Submitted by	Company	Date Submitted
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#### 7.1. Resource Adequacy Capacity procured by Reserve Sharing LSEs

PG&E supports the comments offered by Southern California Edison (SCE)<sup>1</sup>: 'Resource Sharing LSE', in section 7.1, (page 77), is not found anywhere else in the BPM or in the tariff. The CAISO should define this term. If the term is already defined, please provide a cross reference to the definition.

##### 7.1.1. Summary of Bidding Requirements for Resources Providing RA Capacity

PG&E agrees with the proposed changes to bid insertion rules for "Non-generator resource (Non-REM)" and "Non-generator resource (REM)" sections. However, the other changes contained in the "Summary of Bidding Requirements for Resources Providing RA Capacity" table are premature and have not yet been accepted by FERC. These changes are reflective of proposed tariff language and therefore should not be put into effect.

Additionally, the CAISO should make the following changes:

- (a) Append the text "No RTM obligation for Long-Start or Extremely Long-Start units. (ISO Tariff, Section 40.6.2(c&d))" to the RTM requirements of "Generating Units Including Pseudo Ties (other than Use-Limited Resources)" line item considering that Long-Start or Extremely Long-Start units not scheduled in the DAM or RUC do not have RTM obligations.
- (b) Append the text "for all hours of the month the resource is physically available" to the IFM and RTM requirements of "Hydro Units", "Pumping Load", "Non-Dispatchable Resources", and "Conditionally Available Resources". This change is consistent with the "Generating Units Including Pseudo Ties (other than Use-Limited Resources)" line item.

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<sup>1</sup>PRR1140 – Stakeholder Comments:

<https://bpmcm.caiso.com/Lists/PRR%20Comments/Attachments/1683/SCE%20Initial%20Comments%20on%20PRR%201140.pdf>

- (c) Remove the language which references “Eligible Intermittent Resource (EIR)” and revert to previous versions which reflect bid insertion exemptions for “Variable Energy Resources (VERs)”. This proposed change has not been accepted by FERC and therefore should not be implemented.

#### **7.1.2.(4) Day-Ahead Market**

For reasons described in our comments on Section 7.1.1. the CAISO should append the text “for all hours of the month the resource is physically available” to the language which states: “Hydro Units, Pumping Load, Non-Dispatchable Resources, and Conditionally-Available Resources must submit Economic Bids or Self-Schedules to the DAM all RA Capacity for all hours of the month for all available energy up to RA Capacity quantity.”

#### **7.1.2.(6) Day-Ahead Market**

The CAISO should replace the text “not on Outage” with “physically available; however, any RUC schedule for these resources will not be binding” as per Section 40.6.4.3.5. of the tariff.

#### **7.1.3. Real-Time Market**

For reasons described in our comments on Section 7.1.1. the CAISO should append the text “for all hours of the month the resource is physically available” to the language which states: “Hydro Units, Pumping Load, Non-Dispatchable Resources, and Conditionally-Available Resources must submit Economic Bids or Self-Schedules to the RTM all RA Capacity for all hours of the month for all available energy up to RA Capacity quantity.”

The CAISO should also delete the text “that are also Conditionally-Available Resources or Non-Dispatchable Resources” considering that all Long-Start or Extremely Long-Start units not scheduled in the DAM or RUC do not have RTM obligations.

#### **9.3.3. Nature of Work Attributes for Forced Outages**

PG&E supports the comments offered by SCE<sup>2</sup> and recommends the following changes to Page 116 (changes in red font):

- a. Monthly **use limit reached** nature of work will exempt the resource from RAAIM for the rest of the month.
- b. Annual **use limit reached** nature of work will get a RAAIM exemption for the RA month where the outage was submitted.
- c. Other **use limit reached** nature of work will get a RAAIM exemption for the RA month where the outage was submitted.

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<sup>2</sup> *Ibid.*