

**PRR 1139 Comments**

**Updates to nature of work attributes for generation outages & outage reporting section**

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on PRR 1139, "Updates to nature of work attributes for generation outages & outage reporting section."

Through various channels, the CAISO has acknowledged that there are challenges and a lack clarity around the must offer obligations, RAIM charges, and outage types that apply to various categories of resources, especially hydro. For example, FERC has recently said that hydro resources that are also Variable Energy Resources should not have RAIM penalties. PG&E and the CAISO are having ongoing discussions on the must offer obligations and use of cards.

Therefore, the changes to the Non-temperature ambient NOW should not be made at this time, as there is a total lack of clarity on the policy intent. The Change management BPM states, "Significant proposed revisions may fall outside the scope of a proposed change to a BPM and may require alternative treatment." This particular change is outside the scope of CCE3 and does not need to be made currently.

The CAISO has stated: "The ISO is not averse to considering these issues in a stakeholder process. Such a stakeholder process would need to be considered relative to other desired policy initiatives through the ISO's 2020 Policy Roadmap process."

Given the immediate discussions occurring, while PG&E is supportive of a broader discussion, this change should not be made and is beyond the scope of a PRR.