

**Proposed Revision Request (“PRR”) 1154 Comments  
Resource Adequacy Availability Incentive Mechanism (“RAAIM”) Exemption Updates**

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company (“PG&E”) appreciates the opportunity to comment on PRR 1154, “RAAIM Exemption Updates.”

**PG&E Opposes Removing RAAIM Exemption for the Environmental Restrictions Nature of Work (NoW)**

The CAISO has suggested that certain categories of NoW should no longer be exempt from RAAIM. While PG&E supports the removal of RAAIM exemptions for certain categories, PG&E specifically opposes the removal of the RAAIM exemption for the Environmental Restrictions NoW category.

PG&E disagrees with the CAISO’s assertion that outages that may fall under the Environmental Restrictions category are within the generation resource’s control. There are specific circumstances where the Environmental Restrictions NoW is the appropriate category to use for outages caused by uncontrollable or unforeseen events.

For example, PG&E used this NoW to take an outage on a wind facility due to nearby condors. In this circumstance, PG&E could not predict when condors would be in close proximity to its wind facility and would require an outage due to restrictions tied to the environment.

Another circumstance occurs when there is a natural gas system outage and PG&E has a dual fuel facility that can operate for a limited set of hours on diesel (limited because of the air permit). If the resource has run through the permitted diesel hours, and the natural gas system is still on outage, it would be appropriate to use the Environmental Restrictions NoW.

Both circumstances presented are not predictable and are completely outside of the generation resource’s control.

Removing the RAAIM exemption for this nature of work is inconsistent with the tariff section 40.9.3.4(d) *vis a vis* ER19-1562-000