**PRR 1155 Comments**

**References to Tariff 43A and Availability Assessment Hour for 2020**

|  |  |  |
| --- | --- | --- |
| **Submitted by** | **Company** | **Date Submitted** |
| Sarah Ordway  415-973-3945  Sarah.Ordway@pge.com | Pacific Gas and Electric Company | June 6, 2019 |

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on PRR 1155, “References to Tariff 43A and availability assessment hour for 2020.”

1. **PG&E Suggests the Following Edits to the Availability Assessment Hours for 2020 to Provide Further Clarity and Consistency**

The assessment hours for flexible capacity should be HE16-HE20 for both the summer and winter months, in accordance with the Final 2020 FCR Study[[1]](#footnote-1) and the Final Availability Assessment Hours presentation[[2]](#footnote-2), both published on May 15, 2019. The assessment hours listed in the table under the “Required Bidding Hours” column incorrectly states the hours for peak ramping and super-peak ramping resources for the winter months.

Furthermore, to promote consistency among the definitions and requirements, PG&E requests that the CAISO align the definitions of the summer and winter months in the Final 2020 Availability Assessment Hours Report and the Final 2020 FCR Report. Specifically, PG&E proposes that the CAISO modify:

1. the summer months for the system and local RA availability assessment hours set forth in the Final 2020 Availability Assessment Hours Report so that they cover the months of May through September; and
2. the winter months for the system and local RA availability assessment hours set forth in the Final 2020 Availability Assessment Hours Report so that they cover the months of October through April

The proposed changes to the system and local RA availability assessment hours for the summer and winter months in the Final 2020 Availability Assessment Hours Report will ensure alignment with the flexible RA availability assessment hours in the Final 2020 FCR Report and the Commission’s requirement of LSEs in the year-ahead compliance filing process. PG&E does not anticipate any material adverse impacts of its recommendation given that the availability assessment hours for system and local RA does not change throughout the 2020 RA compliance year.

1. **PG&E Suggests the Following Edits to Clarify the Proposed Change to the Bidding Requirements for the Non-Generator Resources in the RTM**

PG&E does not oppose the clarification of the word “economic” added to the RTM flexible capacity bidding requirements for non-generator resources, however, further clarification should be included that the bidding requirement within that section applies specifically to non-generator resources that are flagged as “regulation energy management” in accordance with Tariff Section 40.10.6.1(h).

PG&E further proposes that the requirements under the RTM column should match the format provided under the IFM column to include all the bidding requirements for non-generator resources, with the breakdown of those not flagged as regulation energy management and those flagged as regulation energy management. This will aid in providing clarity and consistency.

**D. Conclusion**

PG&E appreciates the opportunity to provide feedback on PRR 1155 and believes that the foregoing edits are necessary to provide further clarity and consistency throughout the Tariff, BPM, and Flexible Capacity Assessment processes.

1. See Flexible Capacity Needs Assessment for 2020, pg. 4. <http://www.caiso.com/Documents/Final2020FlexibleCapacityNeedsAssessment.pdf> [↑](#footnote-ref-1)
2. See Final Availability Assessment Hours presentation, slide 12. <http://www.caiso.com/Documents/Presentation-FinalFlexibleCapacityNeeds-AvailabilityAssessmentHourRequirementss.pdf> [↑](#footnote-ref-2)