

PRR 1181 Comments  
Attachment B changes to support Tariff Section 4.6.4 (Masterfile Submission)

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on Proposed Revision Request (PRR) 1181.

Requiring supporting materials submitted via the Customer Inquiry Dispute and Information (CIDI) system for every proposed Master File change is administratively burdensome for Scheduling Coordinators (SC).

PG&E requests the CAISO keep the option of explaining simple/routine changes in the Comments field in the Upload screen of the CAISO’s Master File application.

For example, if a Master File change is due to a CAISO test result, resubmitting the test results back to the CAISO via CIDI as substantiation for a change seems unnecessary. Additionally, Master File changes occur frequently for PG&E’s Proxy Demand Resources due to re-registrations documented in the CAISO’s Demand Response Registration System (DRRS). The CAISO should consider exempting CIDI ticket justification for maintenance/administrative updates (e.g. PMax changes) for Demand Response resources.

PG&E requests the CAISO complete the PRR 1181 stakeholder process before requiring SCs to submit CIDI tickets with every Master File change.

PG&E proposes the following PRR wording change to allow for more flexibility in submission of proposed Master File changes that can be reasonably substantiated in a Comments field.

of requests.) ~~If~~The RDT ~~will~~may not be accepted if any of the following occurs:

- The RDT fails a business rule~~or~~
- The request is not accompanied by ~~— does not include a business justification for the change—~~
- or~~If~~ appropriate supporting materials are not submitted via CIDI
- —The ISO needs additional time to review the supporting materials
- The ISO requests additional information from the SC