

**PRR 1254 Recommendation Comments
Variable Energy Resources Off Peak Opportunity Outage**

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company (PG&E) supports Business Practice Manual (BPM) Proposed Revision Request (PRR) 1254 as submitted by Southern California Edison (SCE).

PG&E agrees the CAISO's current process incorrectly subjects solar Variable Energy Resources (VERs) to Planned Outage Substitution Obligation (POSO) requirements during times with no generator production and no impact on reliability.

PG&E requests the CAISO refine the Off-Peak Opportunity Outage (OPOO) and POSO validation processes via clarified BPM language to reflect actual reliability conditions.