PG&E’s comments on CAISO’s Proposed Revision Request 1280

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***Matrix Issue*:**  PRR1280 will have harmful impacts that are inconsistent with state law and state policy.

***CAISO Response[[1]](#footnote-1):*** The key outcome of PRR1280 is to ensure consistent treatment of all RA resources under the CAISO tariff and that resources counting towards meeting RA obligations be shown on RA supply plans. This outcome is neutral as to particular resource types and ensures consistent and non‐discriminatory treatment among all resources providing RA capacity. In general, resources shown on RA supply plans face exposure to RAAIM non‐availability charges if they cannot satisfy their RA capacity obligations. The CAISO acknowledges some resources may now face such exposure because of this PRR. The CAISO, however, does not agree that ensuring more even application of RAAIM across resources meeting RA obligations is an impermissible harmful impact.

***PG&E Response:*** CAISO’s policy continues to be inconsistent with state policy. The California Public Utilities Commission (CPUC) has already allocated 2021 resource adequacy credit for DR to all of its jurisdictional load serving entities (LSE). The CPUC outlines its filing and DR crediting rules in 2020 RA Users Guide[[2]](#footnote-2). CAISO’s PRR results in a scenario in which DR not on a LSE’s supply plan does not count for the impact on resource adequacy. As the CPUC and CAISO jointly administer the resource adequacy program, this change should not be decided solely by the CAISO, but should have been done jointly with the CPUC. PG&E urges the CAISO to either not pursue this change or to identify an alternative solution. PG&E continues to oppose PRR 1280 and protests the filing on the basis that it conflicts with CPUC guidance on how DR is counted for capacity purposes.

1. PRR 1280. Initial Comments Matrix. <https://bpmcm.caiso.com/Lists/PRR%20Comments/Attachments/1914/PRR1280_Initial_Comments_Matrix.pdf> [↑](#footnote-ref-1)
2. R.17-09-009. 2021 Filing Guide for System, Local and Flexible Resource Adequacy (RA) Compliance Filings. Issued October 2, 2020. Page 30. <https://www.cpuc.ca.gov/WorkArea/DownloadAsset.aspx?id=6442466394> [↑](#footnote-ref-2)