PG&E’s comments on CAISO’s Proposed Revision Request 1285

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| Submitted by | Company | Date Submitted |
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Pacific Gas and Electric Company (PG&E) thanks the CAISO for the opportunity to comment on PRR 1285, “Reliability must run credits for legacy reliability must run contracts.” PG&E supports the CAISO’s efforts to provide clarity on the process by which Resource Adequacy credits are allocated to CPUC-jurisdictional Load Serving Entities from legacy Reliability Must Run (RMR) contracts. Where possible, any updates the CAISO implements should be developed with consideration for the CPUC’s Resource Adequacy program to ensure consistency and increased alignment with the CAISO’s and CPUC’s compliance requirements.

PG&E respectfully asks that the proposed language be updated (1) to clearly specify when the CAISO will provide the information to the CPUC and (2) to emphasize the alignment with the CPUC’s credit allocation process. For example, PG&E proposes the third sentence include a date: “Each year, the CAISO will provide information to the CPUC [by date] regarding the allocation of Resource Adequacy credits to CPUC-jurisdictional Load Serving Entities to allow the CPUC to determine whether the Load Serving Entity should receive the Resource Adequacy credits the CAISO has allocated.” Additionally, PG&E also proposes amending the forth sentence to read: “If the CPUC notifies the CAISO of any adjusted initial allocation or subsequent reallocation of RMR credits among the CPUC-jurisdictional Load Serving Entities, the CAISO will reflect the revised allocation in its systems prospectively and ensure alignment with the CPUC’s allocation of RMR credits at the next practicable opportunity.”

Finally, to harmonize the language in the existing BPM and proposed new section, PG&E proposes revising the following sentence to read: “The CAISO will provide  Resource Adequacy credits (local, system, and flexible, whichever  applicable) to the Scheduling Coordinators of LSEs that serve load in the TAC Area(s) in which the need for the Reliability Must-Run Contract arose equal to the LSE’s pro rata share of the eligible NQC of the RMR Resource ~~Contract capacity~~, which shall be based upon each LSE’s annual peak demand forecast calculated under Section 40.2.2.3 for the calendar year in which the RMR agreement will be in effect and broken down on a monthly basis compared to the corresponding total forecasted monthly peak demand in the TAC Area(s).”