# Pacific Gas and Electric (PG&E) follow-up comments on Proposed Revision Request (PRR) 1498 - Opting into the Western Energy Imbalance Market (WEIM) Emergency Assistance Energy

June 14, 2023

PG&E supports CAISO’s effort to deliver reliability benefits to the CISO balancing area[[1]](#footnote-2) authority via assistance energy transfers in a situation where reliability challenges exist.

While improvements[[2]](#footnote-3) and additional explanation[[3]](#footnote-4) have helped address outstanding comments PG&E remains concerned about an untested process and the high price. PG&E respectfully requests CAISO closely monitor and provide reports on assistance energy implementation effectiveness (*i.e.*, cost vs benefits) as well as a full analysis and explanation of any assistance energy charges incurred.

CAISO refinements in the methods for opting into the Emergency Assistance Energy, and additional context for the quantity of transfers subject to the surcharge,[[4]](#footnote-5) have provided stakeholders increased comfort that California customers will not be charged unnecessarily in support of access to resources needed for reliability.

PG&E appreciates that CAISO has also provided additional information regarding California’s emergency resources in the event of a failure of the Resource Sufficiency Evaluation (RSE). The CAISO expects that deployment of backup generators, strategic reserves, demand response, Reliability Demand Response Resources, and other programs and mechanisms made available under its tariff will lead to a reduction of the final quantity subject to the Emergency Assistance Energy transfer surcharge.

1. Please note that CISO BAA refers to the balancing authority of the California Independent System Operator (CAISO). CAISO refers to the market operator. [↑](#footnote-ref-2)
2. See the updated PRR language; accessible here <https://bpmcm.caiso.com/Lists/PRR%20Details/Attachments/1498/Assistance%20Energy_draft%20language%20for%20WEIM%20BPM%20v2%2005262023.docx> [↑](#footnote-ref-3)
3. See the CAISO’s response to initial comments on the PRR; accessible here: <https://bpmcm.caiso.com/Lists/PRR%20Details/Attachments/1498/Assistance%20Energy%20Transfer%20BPM%20Response%20FINAL.docx> [↑](#footnote-ref-4)
4. The CAISO clarified that the quantity subject to Emergency Assistance Energy surcharge is the lesser of (a) the WEIM RSE failure amount or (b) the dynamic net WEIM transfers less the applicable CAISO BAA credit for Regulation-Up. [↑](#footnote-ref-5)