

PRR 1133: Local Capacity Requirements Due to Load Migration

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 1133, "Local capacity requirements due to load migration." PG&E supports the CAISO's efforts to provide clarity on the process by which Local Capacity Requirements (LCR) will be updated to account for load migration. 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 local compliance requirements. For instance, at a minimum the updated LCR should be provided to LSE's for the month-ahead RA process on the same schedule as the current Cost Allocation Mechanism (CAM) or Reliability Must Run (RMR) adjustments (i.e., a quarter in advance with updates in Jan, Apr, Jul, Oct for the periods Q2, Q3, Q4, Q1, respectively. Providing the LCR for the balance of the year in each quarterly update would be even more useful for planning. In this preferred method, updates in Jan, Apr, Jul, Oct would be for the periods Apr-Dec, Jul-Dec, Oct-Dec, full prompt year, respectively.

Additionally, PG&E seeks more information on a few items pertaining to this BPM update.

1. What is the proposed implementation date for this process?
2. If load migration varies across months, will the monthly LCR be adjusted for each month of the update (similar to current CAM or RMR) or will there be a single LCR adjustment applying equally to all months of the update?
3. Will the CAISO's proposed implementation result in LCR in any month that differ from the CPUC's requirements in that same month?

Finally, PG&E respectfully asks that the proposed language be updated to clearly specify when LSEs can expect to see adjustments in LCR. For example, PG&E proposes that the second sentence of the proposed language be edited to read "Where the CPUC provides such updates, the CAISO will incorporate the updated Local Capacity Requirements into LSEs' monthly RA requirements no later than one month after the CPUC has provided such updates to the CAISO."