**Pacific Gas and Electric Company’s Informal Comments and
Recommended Changes to the CAISO’s Updates to the Business Practice Manual for Reliability Requirements (PRR 1343 – Resource Adequacy Enhancements Phase 1)**

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PG&E appreciates the opportunity to comment on CAISO PRR 1343 (Resource Adequacy Enhancements Phase 1) for the Reliability Requirements Business Practice Manual (BPM) and offers the following feedback and recommendations.

**General Comments:**

The Reliability Requirements BPM updates do not provide enough detailed guidance to operationalize the RA Enhancements Phase 1 changes. PG&E urges the CAISO to expand its revisions to provide more details about the timing of outage entry and the resulting substitution obligation. Below are specific examples PG&E asks that the CAISO consider revising and/or expanding.

**Section 9.2.1 – Nature of Work Attributes for Planned Outages:**

* PG&E seeks clarification that the Nature of Work categories and substitution requirement (Y/N) be updated to reflect the new RA substitution rules. For example, CAISO has informed LSEs that Unit Testing planned outages will require full substitution, however, the table in Section 9.2.1 still lists Unit Testing as ‘N’ in terms of substitution required. (Section 9.2.1, pg. 111)

**Section 9.2.2.1 – Time frame for submitting unit substitutions**

* PG&E seeks significant clarification and details within this entire section. This section serves as the only descriptor of the new RA Substitute Capacity (RASC) construct for planned outages, and currently it does not provide adequate clarity or direction for LSEs. (Section 9.2.2.1, pg. 113)
* PG&E recommends providing a timeline and process map, similar to Sections 5.2.1.2 and 5.2.1.3 which clearly demonstrates discreet timelines to provide substitution on existing planned for (1) planned outages submitted before T-29, and (2) planned outages submitted after T-29. In addition, the draft BPM is silent on the process to extend an existing planned outage and provide substitution. (Section 9.2.2.1, pg. 113)

For example, below are questions that the BPM should be able to answer:

* + When is the initial RASC run at T-29, or T-30? And when are RASC substitutions due by T-28 or T-29?
	+ What about outage changes, such as a re-scheduled set of dates, or an extension?
	+ What is the obligation if the outage has already started? Conversely, what is the obligation if the outage has not yet started?
* PG&E requests clarification of the following sentence: “The substitution has to be provided…within 24 hours of the *outage submission* for outages submitted on or after T-29” (pg. 113). Is the substitution required within 24 hours of outage submission in OMS, or is it within 24 hours of the outage being captured in the subsequent RASC evaluation run (daily at 8am)? (Section 9.2.2.1, pg. 113)
* PG&E requests clarification on the example scenario provided in Section 9.2.2.1. In the example, it is PG&E’s understanding that the substitute capacity for the outage on Resource A should be submitted before the RASC run on 9/22, ***not 9/23***, due to the 24 hour timeframe required. Can CAISO please clarify if the 9/23 date was listed incorrectly, or if actually correct, provide explanation as to why substitution would not be required within 24 hours of the RASC run on 9/21? (Section 9.2.2.1, pg. 113)