

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Establish
Policies, Processes, and Rules to Ensure
Safe and Reliable Gas Systems in
California and perform Long-Term Gas
System Planning

Rulemaking 20-01-007
(Filed January 16, 2020)

**COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Roger E. Collanton
General Counsel
Anthony Ivancovich
Deputy General Counsel
Jordan Pinjuv
Senior Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630
Tel.: (916) 351-4429
Fax: (916) 608-7222
jpjuv@caiso.com

Attorneys for the California Independent
System Operator Corporation

March 19, 2021

Table of Contents

I.	Introduction.....	1
II.	Discussion.....	1
III.	Conclusion	2

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Establish Policies, Processes, and Rules to Ensure Safe and Reliable Gas Systems in California and perform Long-Term Gas System Planning

Rulemaking 20-01-007
(Filed January 16, 2020)

**COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

I. Introduction

Pursuant to the February 26, 2021 *Assigned Administrative Law Judge's Ruling Seeking Comment* (Ruling), the California Independent System Operator Corporation (CAISO) provides comments on the questions in Attachment 1 related to the scope of issues outlined in Phase 1.

II. Discussion

The CAISO's response is limited to the questions outlined in Track 1B, Scoping Memo Issue 3. The CASO first includes the relevant questions below.

Track 1B, Scoping Memo Issue 3

Should pipeline operating procedures, such as those for curtailments and operational flow orders (OFO), be uniform across the state? Would there be any market and reliability impact if pipeline operating procedures were not uniform?

Questions:

- 1. Should the Commission align SoCalGas' summer OFO structure with its winter OFO structure when the current rules expire on October 31, 2021?**
 - a. If not, should it extend the summer OFO structure currently in place when the current rules expire on October 31, 2021?**

The CAISO reiterates its support for Energy Division Staff's recommendation to extend SoCalGas' current winter OFO penalty structure, which caps the Stage 4 and Stage 5 OFO non-compliance penalties from \$25/dth to \$5/dth. The current rules will otherwise expire on October 31, 2021.¹ The Commission should extend the current rules based on experience from 2018

¹ D.19-05-030.

when OFO noncompliance penalties increased electricity market prices but it was unclear whether those higher prices provided any commensurate reliability benefit for the gas system.²

III. Conclusion

The CAISO appreciates the opportunity to submit comments in this proceeding.

Respectfully submitted,

By: /s/ Jordan Pinjuv

Roger E. Collanton

General Counsel

Anthony Ivancovich

Deputy General Counsel

Jordan Pinjuv

Senior Counsel

California Independent System

Operator Corporation

250 Outcropping Way

Folsom, CA 95630

Tel.: (916) 351-4429

Fax: (916) 608-7222

jpjuv@caiso.com

March 19, 2020

² CAISO, *Response to Joint Motion for Expedited Relief*, A.14-06-021, A.14-12-017, September 4, 2018. See also comments from Department of Market Monitoring of the California Independent System Operator Corporation, *Response to Joint Motion for Expedited Relief*, A.14-06-021, A.14-12-017, September 4, 2018