

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

Application of Pacific Gas and Electric Company for Approval of 2013 – 2014 Statewide Marketing, Education, and Outreach Program and Budget (U39M)	Application 12-08-007 (Filed August 2, 2012)
And Related Matters	Application 12-08-008 Application 12-08-009 Application 12-08-010 (Filed August 3, 2012)

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

**I. Introduction**

The California Independent System Operator Corporation (CAISO) supports directing Southern California Gas Company (SoCalGas) to provide additional funding for marketing, education, and outreach activities to reduce the risk of natural gas and electricity curtailments in the Los Angeles basin this summer, due to the ongoing effects of the natural gas leak at SoCalGas’ Aliso Canyon storage facility.<sup>1</sup>

**II. Discussion**

In 2017, the Commission authorized five million dollars to be spent on paid advertising to support the Flex Alert program. In 2017, the CAISO called Flex Alert events on June 20 and 21, August 29, and September 1. Paid media advertising supported these Flex Alert calls which resulted in capacity reductions. The natural gas and electric systems will continue to face reliability challenges in 2018 due to the limited availability of the Aliso Canyon storage facility. In light of the ongoing challenges, the CAISO recommends that the Commission authorize additional funding to support paid advertisements for the 2017 Flex Alert program.

The CAISO addresses Question 3 posed in the Ruling below.

***Ruling Question 3. Does the current state of natural gas supply in Southern California, in light of expected storage inventory and pipeline supplies, necessitate continued funding for Flex Alerts in 2018?***

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<sup>1</sup> The CAISO files these comments in response to the March 5, 2018, E-Mail Ruling Soliciting Comments From Parties (Ruling).

The CAISO recommends that the Commission direct SoCalGas to provide additional funding to support paid advertisements for the Flex Alert campaign. The CAISO estimates that these Flex Alert calls can result in approximately 250-500 MW in capacity savings during hours of critical need. The CAISO believes that continuing limitations on use of the Aliso Canyon storage facility and curtailment of the region's gas-fired power plants, as well as the potentially limited capacity at other natural gas storage facilities due to other safety programs warrant additional paid advertising to support the Flex Alert program. The CAISO supports additional funding for paid Flex Alert advertisements to ensure that the program remains an effective tool to mitigate electric reliability concerns during the summer and beyond.

### **III. Conclusion**

The CAISO appreciates this opportunity to provide comments on 2018 Flex Alert funding. The CAISO recommends that the Commission continue its support for the Flex Alert program as an effective means to address electric reliability concerns.

Respectfully submitted,

**By: /s/ Jordan Pinjuv**

Roger Collanton  
General Counsel  
Anthony Ivancovich  
Deputy General Counsel  
Anna McKenna  
Assistant General Counsel  
Jordan Pinjuv  
Senior Counsel  
California Independent System  
Operator Corporation  
250 Outcropping Way  
Folsom, CA 95630  
T – 916-351-4429  
F – 916-608-7222  
[jpjuv@caiso.com](mailto:jpjuv@caiso.com)

Attorneys for the California Independent System  
Operator Corporation

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