

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

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| 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.¹

II. Discussion

In 2017 and 2018, the Commission authorized five million dollars to be spent on paid advertising to support the Flex Alert program. The CAISO believes this funding contributed to the effectiveness of the CAISO’s Flex Alert campaign and the reliable operation of the electric grid. In 2019, the natural gas and electric systems will continue to face reliability challenges 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 2019 Flex Alert program.

The CAISO specifically addresses Question 3 posed in the Ruling, as reproduced 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 2019?

¹ The CAISO files these comments in response to the April 23, 2019, Administrative Law Judge’s Ruling Soliciting Party Comment (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 Flex Alert calls can result in approximately 250-500 MW in capacity savings during hours of critical need. The continuing limitations on use of the Aliso Canyon storage facility and possible curtailment of the region's gas-fired power plants 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 2019 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

Attorneys for the California Independent System

Operator Corporation

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