PG&E's Comments

Working Group on Use-limitations for Storage Resources

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PG&E appreciates the opportunity to comment on CAISO's Working Group Web Conference on use-limitations for storage resources dated September 13, 2016.

In response, PG&E offers the following comments:

- PG&E suggests that the CAISO incorporate a daily throughput (MWh discharge) limit that participants could specify on a daily basis. In this way, the CAISO will likely be in a better position to optimize when the storage resource should discharge.
- Once the daily throughput limit is reached, storage resources should be exempt from RAAIM penalties.