



PG&E's Comments on Multi-Stage Generating Resource Draft Tariff Language

Submitted by	Date Submitted
Bahaa Seireg (415) 973-0541 b1st@pge.com	May 12, 2010
Derick Stowe (415) 973-5662 d6si@pge.com	

Pacific Gas & Electric Company (PG&E) appreciates the opportunity to comment Multi - Stage Generating Resource (MSG) Draft Tariff Language.

COMMENTS

1) Section 30.5.1: General Bidding Rules

Comments

PG&E interprets the proposed tariff language in this section to mean:

- Any self-schedule or self- provision of AS will be restricted to being in the configuration that was awarded in the IFM (see subsection (g)). Because these requirements extend to energy awards as well as Ancillary Services and RUC (per subsection (o)), it will in general not be possible for MSG resources to offer the capability to “dec” to lower configurations from the awarded one, without losing the ability to self-schedule.
- If the configuration awarded in the IFM cannot be satisfied in RT (for example because of an outage), the MSG resource cannot submit any self schedule or self provision of AS. In addition, a bid will be created automatically in the awarded configuration but that the outage in SLIC will prevent the automatically created bid from being used in the market.

Given that the proposed tariff language in Section 30.5.1 clarifies and modifies previous language in the MSG white paper and presentations, PG&E would like the CAISO to confirm that the above interpretation is correct.

2) 30.5.2.2 Supply Bids for Participating Generators

Comments

This proposed language in this section provides for more flexibility in the submission of RT bid configurations than had been previously understood, as it allows market participants to submit a “required” RT bid to cover RUC capacity and AS self provision awarded in the IFM, as well as three *additional* feasible RT configurations.

PG&E’s previous understanding was that the CAISO would automatically create the “required” configuration bid (awarded in the IFM), leaving the market participant free to bid three configurations other than the required one. But this language seems to explicitly state that the CAISO will enable market participants to create the required bid as well as three additional configuration bids.

Given that the proposed tariff language in Section 30.5.2 clarifies and modifies previous descriptions of SIBR RT business rules, PG&E would like the CAISO to confirm that the above understanding is correct.