

Market and Infrastructure Policy

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Policy Initiatives Catalog Submission Form

California ISO Policy Initiatives Catalog Submission Form

This purpose of this form is to propose potential policy initiatives that require a stakeholder process and typically require tariff changes. Do not use this form to request or propose process improvements or administrative changes. Such requests should be made through your Customer Service Representative or Account Manager

Date: 6/14/2018

Submitter Information

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Please provide a title for the issue.

Exceptional Dispatch Scheduling for Pipeline Inspections

Please provide a summary description of the issue (i.e. 500 words)

For PG&E Gas Operations to conduct in-line safety inspections of its pipelines, it periodically requires generators to operate at a prescribed output (exceptional dispatch) for defined periods of time. While CAISO has previously been helpful in working with PG&E to coordinate such inspections, generators have sometimes been unwilling to accommodate these necessary scheduling needs. This can put PG&E in a difficult logistical position, especially given that in-line inspections are mandated to occur every seven years. Beginning in 2019 through 2025 PG&E has 166 gas transmission lines requiring in-line inspection of one or more segments on each line. Market rules are needed to accommodate the dispatching of gas generation when inspections are underway.

Please provide any data/information available that would characterize the importance or magnitude of the issue.

As California's gas-fired generation mix changes, the need and value of remaining generators continues to increase. At this same time, the mandated scheduling of in-line inspections, as regulated by the U.S. Department of Transportation (DOT) and the CPUC, has remained constant. PG&E and other gas pipeline operators must have the ability to schedule generators through exceptional dispatch to accommodate critical gas safety work. As a result, PG&E deems there to be an immediate need for creation of a formal stakeholder process to address this concern. Without changes to the current paradigm, PG&E will be unable to comply with DOT and CPUC regulations.

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