| 🍣 California ISO | Market and Infrastructure Policy | Template Version: | 1 |
|--|-------------------------------------|----------------------|----------|
| | | Document Version: | 0 |
| Policy Initiatives Catalog Submission Form | | Date Created: | 6/1/2017 |

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: 6/29/2018

Submitter Information

| Organization | Contact Name | E-mail | Phone | | |
|---------------------------------------|---------------|----------------------|--------------|--|--|
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Please provide a title for the issue.

Partial Pass Proposal - Ancillary Service Performance Audits

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

Under current CAISO rules, if a resource fails two sequential Ancillary Service (AS) tests, the resource will be immediately disqualified from providing any of its qualified amount of AS Reserve Capacity. To pass a test, a resource must deliver at least 90 percent of an Ancillary Services award within 10 minutes. The CAISO can call for any AS amount up to a resource's AS Reserve Capacity as part of a contingency event or unannounced test.

The current pass/fail testing does not distinguish resources that provided most of the AS capacity (e.g. 88% of the award) from those that completely failed to perform. This may result in an artificial shortage of AS capacity.

PG&E proposes that instead of immediate disqualification, to the extent that a resource achieves some of its AS Reserve Capacity, a resource only be disqualified for a portion of the AS Reserve Capacity, rather than the full amount. A partial pass of the test will result in reduction of a resource's designated Ancillary Service Reserve Capacity.

PG&E further proposes basing this reduction on an average of percent compliance with dispatch for two partially passed tests (MW Amount Delivered/MW CAISO Requested Capacity). As is currently the case, a retest would reset the AS capacity. This proposal will require updates to the CAISO Tariff (e.g. Section 8.19.16.4).

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

A partial pass approach will mitigate artificial shortage in the AS market and remove any lag caused by retests. The current process can create shortages in the available AS capacity by de-certifying the entire capacity of a resource that is able to partially meet the testing criteria.

Owner: Cook, Gregory

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