

Pacific Gas & Electric Company Comments

Metering Rules Enhancements (“MRE”) Stakeholder Initiative

Submitted by	Company	Date Submitted
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PG&E had previously supported CAISO’s Metering Rules Enhancements (“MRE”) final proposal, dated June 7, 2016, and as modified by the first supplement, dated June 16, 2016. However, PG&E needs further clarification as to the intended applicability of the second supplement, dated September 1, 2016, to metered entities interacting with the CAISO-controlled grid before we are able to form a position responsive to this latest proposal.

The draft final proposal had recognized that many resources had been exempted from various metering requirements, including as applicable the provision of Settlement Quality Meter Data (“SQMD”) in five-minute intervals, and other requirements, and proposed to leave these exemptions in place. This had been a critical foundation for PG&E’s support for the earlier proposal.

On its face, the second supplement proposes to discard this core element of the earlier proposal. The second supplement appears to require all Scheduling Coordinator Metered Entities (“SCMEs”) to provide SQMD in five-minute intervals regardless of past exemptions from this requirement, subject to a two-year transition from the status quo to full compliance with the new requirements.

PG&E will oppose the proposal as modified by the second supplement if CAISO means to require that all existing generators submit meter data in five-minute granularity, especially for generators which are unable to respond to improved price signals. Switching or reconfiguring all of these meters to meet a five-minute interval will incur a high implementation cost and provide limited benefits in return.

However, PG&E can support the modified proposal if CAISO intended that the exemption termination only applies to existing generators that participate in ancillary services and /or imbalance energy, and that other metered entities currently under an exemption would not see that status changed. It is PG&E’s understanding that the five-minute meter data interval requirement would not apply, for example, to loads for Distribution Load Aggregation Points (“DLAPs”), Qualifying Facilities (“QFs”), and Demand Response (“DR”) programs. PG&E requests that the CAISO clarify the application of these new requirements.