



**Comments of Pacific Gas and Electric Company on Contingency Modeling Enhancements Draft Final Proposal**

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on CAISO’s Contingency Modeling Enhancements (CME) Draft Final Proposal dated August 11, 2017.

In general, PG&E supports the Draft Final Proposal and CAISO’s decision to defer the modeling of preventive-corrective constraints with greater than 30 minute corrective time requirements as detailed in its Draft Final Proposal Addendum<sup>1</sup>. PG&E offers the following comments:

**1. PG&E supports CAISO’s decision to defer the modeling of preventive-corrective constraints with greater than 30 minute corrective time requirements, subject to further study and stakeholder discussion.**

CME stakeholder discussions and design papers leading up to the Draft Final Proposal have been centered on the design of preventive-corrective constraints with 30 minute corrective time requirements. PG&E believes the scope of design changes expands when extending the 30 minute model to facilities with 4 hour corrective time requirements and that these changes warrant further evaluation. PG&E supports CAISO deferring the extension of the design to greater than 30 minute corrective time requirements, allowing CAISO and stakeholders additional opportunity to review the feasibility and merit of introducing these new constraints.

**2. PG&E requests CAISO provide information on which constraints it intends to model under CME and how it will determine new constraints to enforce. CAISO should also provide advance notice to stakeholders when CME constraints are enforced in the CRR, Day-ahead, and Real-time markets.**

When the CME stakeholder initiative began in 2013, CAISO intended to apply CME to eight major WECC paths identified under the WECC Regional Reliability Standard TOP-007-WECC-1a. However, WECC Regional Reliability Standard TOP-007-WECC-1a was retired in April 2016, and it is not clear which constraints CAISO intends to model going forward under this design. PG&E requests CAISO provide transparency into which constraints will be modeled under CME and should more constraints be enforced in the future, how CAISO will make these determinations. PG&E also

<sup>1</sup> <http://www.aiso.com/Documents/AddendumDraftFinalProposal-ContingencyModelingEnhancements.pdf>



requests CAISO provide advanced notice to stakeholders when it determines it will enforce specific CME constraints in CRR, Day-ahead, and Real-time markets.

- 3. PG&E appreciates CAISO's commitment to monitor and publicly report on the amount of preventive-corrective congestion revenues collected by the Day-ahead market. PG&E additionally requests CAISO release shadow prices and shift factors of nodes associated with these congestion revenues to help stakeholders better understand and trace the drivers.**

Under the Draft Final Proposal, CAISO's will not distribute preventive-corrective congestion revenues collected by the day-ahead market to CRR holders. PG&E supports CAISO monitoring and publicly reporting on the magnitude of these revenues. Additionally, PG&E requests that CAISO release to stakeholders the shadow prices of the binding constraints and shift factors of nodes associated with these congestion revenues so stakeholders can understand and trace the drivers of these amounts.