PG&E Comments:

A/S in HASP – Draft Tariff Language

Submitted by	Company	Date Submitted
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Pacific Gas & Electric (PG&E) appreciates the opportunity to participate in the Ancillary Services Procurement in HASP and Dispatch Logic stakeholder process and to submit comments regarding the November 24th Draft Compliance Filing Language.

Summary

PG&E feels the draft tariff language succeeds in establishing the basic functionality to procure ancillary services in HASP and accurately resolves a number of issues raised in the stakeholder process. First, we acknowledge that much of the additional material presented is simply a reinsertion of original tariff language. It is our understanding that this language has been previously vetted and we offer no substantive changes. Regarding the new tariff language that resulted from this initiative, we suggest only minor edits to correct typographical errors and improve clarity.

Ordered List of Typographical Errors and Suggestions

8.2.3.1 (Line 11): The proposed language states that A/S awards from HASP are "not binding and are re-optimized in the Real-Time Market." This would suggest that both energy and A/S are co-optimized every 5 minutes in the RTD. However, it is our understanding that A/S awards become binding in the RTPD timeframe (every 15 minutes) and are issued along with advisory energy awards for the RTD. We would appreciate a more nuanced explanation of this approach to signify that A/S does not directly co-optimize with energy on a 5 minute basis.

8.3.1 (Line 1) The first sentence in this section lacks verbal agreement. We suggest either: "The CAISO shall operate competitive Day-Ahead, Hour-Ahead, and Real-Time markets," or, "The CAISO shall operate a competitive Day-Ahead Market, HASP, and Real Time Markets."

(Line 27) After the large additional section, the following existing sentence begins with a lowercase "t". This should be capitalized.

8.3.7 (Lines 16-18) In the sentence spanning these three lines, the phrase "one Ancillary Services" does not have numerical agreement. We suggest changing it to, "The same

resource capacity may be simultaneously offered into the CAISO market for multiple Ancillary Service types."

(**Line 19**) The sentence beginning on this line would read more clearly as, "Operating Reserve Ramp Rates will *only be used* by the CAISO. . ."

(**Lines 28-10**) The last sentence in this section lacks two critical commas. We suggest that the sentence read, "All resources subject to the ancillary Services must offer requirement**,** as specified in Section 40.6**,** must submit Bids consistent with the requirements therein and in Section 30."

8.6.2 (**Lines 17-18**) To make sense grammatically, the sentence beginning on line 17 should read, "All resources subject to Resource Adequacy requirements will be treated *consistently* and must comply with the bidding requirements of Section 40.6."

8.7 (Line4) In the middle of this line the word "he" appears, but we suspect is was meant to be "the".

11.10.3.1 (Line 1) After the semicolon we suggest changing the phrase "(1) sum" to "(1) *the* sum." This makes both enumerated points consistent in that they begin with an article.

11.10.9.1 (Line 4) The sentence beginning on this line lacks the word "that" and should instead read, "To the extent *that* an Ancillary Service. . ."

(**Lines 8-9**) The sentence beginning on line 8 appears to be straddling two verb tenses, namely the past and the future. We suggest shifting the whole sentence to the past conditional tense. We also propose changing the word "was" one line 8 to "were". Therefore, the sentence would read, "If the Ancillary Services *were* procured from a Dynamic System Resource, the CAISO *would* rescind the payments. . ." We offer an identical critique and suggestion for the sentence directly following this one on lines 11-13.

30.5.2.6 (Line 36) We suggest adding the word "that" to the phrase "for particular resource." The sentence would then read, ". . . Energy for *that* particular resource. . ."

30.7.6.1 (Lines 23-26) The sentence spanning these lines is a run-on. It must either be separated with a comma or broken into two sentences.