## UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

California Independent System	)	Docket No. ER19-354-000
Operator Corporation	)	

## ANSWER TO COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION

The California Independent System Operator Corporation ("CAISO") respectfully submits its answer to the comments filed in the above-identified docket, which concerns the CAISO's tariff revisions to enhance the CAISO's generator contingency and remedial action scheme modeling.<sup>1</sup>

Only two parties filed substantive comments on the CAISO's filing: the CAISO's Department of Market Monitoring and Pacific Gas and Electric Company ("PG&E"). Both parties supported the CAISO's proposal, stating that it will, *inter alia*, "improve the ability of CAISO to account for the unexpected loss of generation or the use of remedial action schemes that include curtailing generation in the event of a contingency in its markets." In addition to its support, PG&E noted that the CAISO's proposed definition of generation loss distribution factor (*GLDF*<sub>Og,n</sub>) in the CAISO's proposed marginal cost of congestion formula may have inadvertently referred to "output" in two places where

The ISO submits this answer pursuant to Rule 213 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213. Capitalized terms not otherwise defined herein have the meanings set forth in the CAISO tariff, and references to specific sections, articles, and appendices are references to sections, articles, and appendices in the current CAISO tariff and revised or proposed in this filing, unless otherwise indicated.

<sup>&</sup>lt;sup>2</sup> California Independent System Operator Corp., "Motion to Intervene and Comments of PG&E," p. 1, Docket No ER19-354-000 (Dec. 7, 2018) ("PG&E Comments").

"maximum capacity" would be more clear.<sup>3</sup> PG&E notes that "maximum capacity" is consistent with the CAISO's proposed policy as described in its transmittal letter and supporting documentation.

The CAISO appreciates PG&E's attention to this wording and its support of the CAISO's proposed enhancements. The CAISO agrees that "maximum capacity" is clearer to the reader than "output," and this mere word change is completely consistent with the CAISO's intent and does not change the CAISO's proposal as set forth in its original filing. Although the CAISO's proposal is just and reasonable as originally proposed, the CAISO is prepared on compliance to make the non-substantive clarifications PG&E proposes.

Dated December 14, 2018

Respectfully submitted,

By: /s/ William H. Weaver

Roger E. Collanton
General Counsel
Sidney L. Mannheim
Assistant General Counsel
William H. Weaver
Senior Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630
Tel: (916) 351-4400

Tel: (916) 351-4400 Fax: (916) 608-7222 bweaver@caiso.com

Counsel for the California Independent System Operator Corporation

<sup>-</sup>

<sup>&</sup>lt;sup>3</sup> PG&E Comments at pp. 3-5. Specifically, the CAISO's proposed tariff revisions stated "This value is the committed generator <u>output</u> at *n* divided by the sum of the <u>output</u> from all committed frequency response capable generators . . . ." PG&E believes that it would be more appropriate to state "This value is the committed generator <u>maximum capacity</u> at *n* divided by the sum of the <u>maximum capacity</u> from all committed frequency response capable generators . . . ."

## **CERTIFICATE OF SERVICE**

I hereby certify that I have served the foregoing document upon all of the parties listed on the official service list for the above-referenced proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, CA this 14th day of December, 2018.

Isl Anna Pascuzzo