



Stakeholder Comments Template

RAAIM Exemption Options for Demand Response Resources

This template has been created for submission of stakeholder comments on the final proposal and draft tariff language that was published on June 10, 2021. The proposal, Stakeholder meeting presentation, and other information related to this initiative may be found on the initiative webpage at:

<http://www.caiso.com/informed/Pages/MeetingsEvents/MiscellaneousStakeholderMeetings/Default.aspx>.

Upon completion of this template, please submit it to initiativecomments@caiso.com. Submissions are requested by close of business on **June 23, 2021**.

Submitted by	Organization	Date Submitted
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Please provide your organization’s comments on the following issues and questions.

Pacific Gas and Electric Company (“PG&E”) hereby provides comments on the Resource Adequacy Availability Assessment Mechanism (RAAIM) Exemption Option Final Proposal. PG&E supports the California Independent System Operator (“CAISO”) seeking RAAIM exemption for Demand Response resources, while urging the CAISO to coordinate with the California Public Utilities Commission (“CPUC”) on the counting methodology for DR, especially for 2022. PG&E conditionally supports the CAISO’s proposal to have DR resources qualifying capacity (“QC”) set through effective load carrying capacity (“ELCC”), or a similar methodology, provided the methodology accurately reflects the variable nature of DR.

PG&E does not support the CAISO’s proposal to give itself unilateral discretion to determine whether or not an alternate methodology is “substantially similar” to the ELCC methodology. As part of the CPUC’s Resource Adequacy (“RA”) Track 3.B1 and Track 4 Proposed Decision, a working group led by the California Energy Commission will be established to determine the future methodology for calculating the QC of Demand Response resources. This tariff amendment should remain flexible enough to adopt the findings of the working group, and not preclude the outcome of the working group by giving the CAISO authority to unilaterally reject the methodology.

PG&E proposes the following updates to the proposed tariff language in section 40.9.2:

(D) Demand Response Resources whose Qualifying Capacity ~~reflects the variable nature of DR and~~ is established using an effective load carrying capability methodology (as that term is used in Section 399.26(d) of the California Public Utilities Code, or a successor provision) or a methodology ~~adopted by the California Public Utilities Commission and/or the California Energy Commission which reflects the variable nature of DR. that the CAISO determines in its sole discretion is substantially similar to the effective load carrying capability methodology.~~ adopted by the California Public Utilities Commission and/or the California Energy Commission which reflects the variable nature of DR.