



Comments of Pacific Gas and Electric Company
Frequency Response
Draft Tariff Language

Submitted by		Company	Date Submitted
Anne-Reed Angino a3aa@pge.com 415-973-8654	Nivad Navid -Azarbaijani NXNQ@pge.com 415-973-1321	PG&E	March 29, 2016

Pacific Gas and Electric Company (PG&E) respectfully submits the following comments in the stakeholder process for the California Independent System Operator’s (CAISO) Frequency Response initiative March 17, 2016 Draft Tariff Language.¹ We look forward to discussing PG&E’s concerns and clarification requests on the stakeholder call scheduled for April 1st, 2015.

Below we comment on the specific sections of the draft tariff language in which we had concerns and address specific tariff language where relevant. In some instances, our comments require additional clarity or language removal rather than edits to existing language.

Section 4.6.4 NERC and WECC Requirements

In this section, we seek further clarification on the scope of listed requirements. As this is driven by a NERC reliability standard, does this limit the scope of applicable generators to NERC’s definition of Bulk Electric System (BES)?

We do also suggest the following edit to the tariff language below to more fully encompass physical restrictions:

Section 4.6.5.1 Participating Generator Performance (Same applies to the same sentence in Appendix K Ancillary Service Requirements Protocol: Part B Certification for Spinning Reserves):

“Participating Generators will not inhibit the real power response of their Generating Units with governor controls by any means that would override the governor response except as necessary to address physical operational constraints for reasons that include ambient temperature limitations, outages of mechanical equipment or environmental regulations regulatory agency requirements.”

¹ http://www.caiso.com/Documents/DraftTariffLanguage_FrequencyResponse.docx

Additionally, both section 4.6.5.1 and Appendix K Part B Certification for Spinning Reserves revised tariff language includes specific language requiring minimum governor performance. PG&E prefers not to include this type of language for specific requirements within the tariff and instead suggests the tariff refer to the technical document where the exact requirements can be found (i.e. WECC standards). The WECC standards do determine that a range is more suitable than a fixed point so that the Generator Owner has “more flexibility in setting governor droop to provide more frequency response when appropriate for reliability.”²

Section 11.34 Invoice Charges for Specific Purposes

In this section, CAISO discusses invoice charges and the common element requirements for specific purposes. The CAISO’s Draft Final Proposal’s Section 7.2.5 on the “Allocation of BAL-003-1 non-compliance penalties,” CAISO states that “Since the ISO is not proposing a minimum performance requirement at this time, the ISO is not proposing additional tariff provisions beyond section 14.7.”³ Including section 11.34 appears to contradict what was communicated in the Draft Final Proposal. Given such, PG&E questions the need for this addition to the Tariff and recommends the CAISO remove section 11.34 as these details are covered in section 14.7.

Should the CAISO feel that this section is, in contrast to the position put forth in the Draft Final Proposal, indeed necessary, PG&E requests that this section 11.34.1 specifically reference section 14.7 as the process by which the “Invoice” specified in section 11.34 would be created. Suggestion includes:

11.34.1 Responsibility to Pay Charges

(a) The CAISO will invoice Scheduling Coordinators for all legitimate costs that are invoiced to the CAISO for a specific purpose in accordance with Section 14.7.

Appendix K Ancillary Service Requirements Protocol (ASRP), Part B Certification for Spinning Reserves

CAISO both edits and enhances the minimum governor performance requirements within the “Ancillary Service Requirement Protocol: Part B Certification for Spinning Reserves.” Within the CAISO’s Draft Final Proposal it is stated that “spinning reserves and primary frequency response products are significantly different products,”⁴ however including enhanced frequency response requirements within this section of the tariff appears to confuse this distinction. PG&E recommends that the ISO remove (from its Appendix K Part B language on AS certification requirements) any references to primary frequency response.

² WECC Governor Droop Setting, PRC-001-WECC-CRT-1.1 Regional Criterion, Pg. 3

³ CAISO Draft Final Proposal, Section 7.2.5., pg. 24.

http://www.caiso.com/Documents/DraftFinalProposal_FrequencyResponse.pdf

⁴ CAISO Draft Final Proposal, Section 7.2.1., pg 18.