

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

Pacific Gas and Electric Company)

Docket No. ER20-1795-000

**MOTION TO INTERVENE AND COMMENTS OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure¹ and the Combined Notice of Filing issued on May 11, 2020 in this docket, the California Independent System Operator Corporation (CAISO) submits this motion to intervene and comments on the petition for limited waiver submitted by Pacific Gas and Electric Company (PG&E) in this docket on May 8, 2020.

I. Motion to Intervene

The CAISO is a non-profit public benefit corporation organized under the laws of the State of California with its principal place of business at 250 Outcropping Way, Folsom, California 95630. The CAISO operates pursuant to its Commission-approved tariff. Through its filing in this docket, PG&E requests the Commission waive certain provisions of that tariff. For that reason, the CAISO has a substantial and direct interest in this proceeding. Because no other party can adequately represent the CAISO's interests in the proceeding, the CAISO's intervention is in the public interest and should be granted.

II. Communications

In accordance with Rule 203(b) of the Commission's Rules of Practice and Procedure,² the CAISO respectfully requests that service of all pleadings, documents,

¹ 18 C.F.R. § 385.214.

² 18 C.F.R. § 385.203(b)(3).

and all communications regarding this proceeding be addressed to the following individuals:

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III. Comments

The CAISO submits these comments to address the financial impact of PG&E's request. According to PG&E's estimate, the Commission's grant of the waiver "will result in a \$20 million impact on resettlement for the entire period."³ PG&E qualifies this estimate by noting that "[b]ecause the CAISO alone has access to all of the settlement data, PG&E cannot determine the exact impact the corrected meter data will have for market participants."⁴

The CAISO has conducted its own estimate and agrees that, based on its understanding of what the correct meter data values are for the dates in question, the figure of \$20 million is an accurate estimate of the net impact to PG&E's financial settlements with the CAISO if the Commission were to grant this waiver request. Processing the revised meter data primarily would impact two CAISO charges codes – real-time uninstructed imbalance energy (CAISO charge code 6475) and real-time

³ PG&E waiver request, at 6.

⁴ *Id.*

unaccounted for energy (CAISO charge code 6474). The estimated net impact to PG&E for *uninstructed imbalance energy* is a payment of approximately \$42 million and the estimated net impact for *unaccounted for energy* is a charge of approximately \$22 million. The overall impact nets to \$20 million, which matches the figure PG&E shared in its waiver filing.

If the Commission grants this waiver, PG&E would not receive a lump sum payment of this amount. Instead, the CAISO would include PG&E's revised meter data on the next available recalculation settlement statements for the relevant trading days. Each individual trading day would be resettled as appropriate based on the new data. The \$20 million represents the estimated net impact at the end of that process. PG&E would receive an additional \$20 million over that period and all other market participants would face offsetting charges that net to \$20 million. Payments and charges for both uninstructed imbalance energy and unaccounted for energy are assessed pro rata to measured demand (loads and exports) less existing transmission contract/transmission ownership right self-schedules plus metered sub-system aggregation net measured demand. Thus, those scheduling coordinators with relatively higher measured demand will be relatively more impacted if this waiver request were granted.

This estimate does not include every potentially impacted charge code. The CAISO has approximately 47 charge codes that are allocated pro rata by load or measured demand. PG&E's revised meter data would change those pro rata weightings and potentially impact all of those charge codes. The CAISO does not have a feasible way of estimating those impacts without actually performing the recalculation settlements process. These impacts, however, are unlikely to impact the \$20 million

figure significantly. The meter data revisions would represent a change of approximately 7% of PG&E's total CAISO demand during the covered time period and would reduce PG&E's overall share of CAISO demand during this period from approximately 19.6% of total CAISO demand to 18.6% of total CAISO demand. This suggests that the changes in pro-rata weightings for these other charge codes likely will not be significant.

IV. Conclusion

The CAISO respectfully requests that the Commission grant the CAISO's motion to intervene and consider its comments.

Respectfully submitted,

/s/ David S. Zlotlow

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Dated: May 29, 2020

CERTIFICATE OF SERVICE

I certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceedings, 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, California this 29th day of May, 2020.

Is/ Anna Pascuzzo

Anna Pascuzzo