



Comments of Pacific Gas & Electric Company 2020 Revised Draft Policy Initiative Catalog

Submitted by	Company	Date Submitted
Simon Ou (415-973-6125)	Pacific Gas & Electric	August 29, 2019

Pacific Gas and Electric Company (PG&E) offers the following comments on the California Independent System Operator’s (CAISO) 2020 Revised Draft Policy Initiative Catalog.

1. PG&E requests CAISO prioritize System Market Power Mitigation initiative and begin the usual stakeholder process by publishing a straw proposal as soon as possible. PG&E also recommends that CAISO ensure adequate time and resources be dedicated to this initiative for the remainder of 2019 and as it is continued in 2020.

PG&E appreciates the analysis that CAISO has done on System Market Power Mitigation. PG&E recognizes that CAISO hosted a Working Group meeting in July and discussed this topic at the recent Market Surveillance Committee (MSC) meeting in August. However, PG&E recommends that CAISO prioritize this initiative and begin the usual stakeholder process by publishing an issue paper and a straw proposal as soon as possible. PG&E also recommends that CAISO ensure adequate time and resources be dedicated to this initiative for the remainder of 2019 and in the beginning 2020 so that this initiative can be implemented by summer of 2020. If nothing else, CAISO should aim to develop interim solutions ready to be implemented quickly in case system market power conditions worsen during the summer of 2020.

2. PG&E continues to highlight the need to expedite the POSO portion from RA Enhancement in order to address this issue in a timely manner

PG&E appreciates CAISO’s consideration of our submission: Planned Outage Substitution Obligation (POSO) Enhancements.

PG&E continues to believe that there is a need to expedite improvements to stand-alone parts of the POSO processes. PG&E is encouraged by, and supports, CAISO’s proposal to “bifurcate” the topics and stagger the implementation of policies within the RA Enhancements, assuming that POSO and other quickly achievable changes are included in the first phase.