

**Comments of Pacific Gas and Electric Company  
EIRP Program Amendment Tariff Changes**

PG&E submits these comments in response to CAISO staff's Eligible Intermittent Resource Protocol (EIRP) Program tariff dated October 21, 2009.

The CAISO staff has proposed tariff and protocol changes effecting eligible intermittent resources 1) extending of the current Participating Intermittent Resource Program (PIRP) telemetry equipment requirements<sup>1</sup> and forecasting fee to all eligible intermittent resources (i.e. not just those participating in PIRP), and 2) lowering the forced outage threshold for eligible intermittent resources from 10mw down to 1mw.

PG&E supports the first element since this is expected to fundamentally improve the intermittent forecasting capability of the CAISO and further, that the uniform application of a forecasting fee will more fittingly follow cost causation principles associated with the CAISO's intermittent forecasting efforts.

PG&E however does not support and recommends changes to the second element, which proposes new tariff provisions that lower the forced outage reporting for *only* eligible intermittent resources. Specifically, PG&E requests that the CAISO remove the proposed additions to Sections 9.3.10.3 and 9.3.10.3.1 that imposes increased forced outage reporting requirements applicable only for intermittent resources down to 1mw. This level of reporting detail is unnecessarily onerous from an implementation standpoint, may not materially affect the quality of CAISO intermittent forecasts, and finally represents an unfair burden on applicable intermittent resources, given that this new standard would *not* apply to conventional resources. There is no strong basis for the inequitable treatment of outage reporting given the indistinguishable nature of electrical output between an intermittent and conventional resource. While the CAISO indicates that increased forced outage reporting is an acceptable burden given the PIRP program benefits, PG&E is not certain that this assumption is justified and is further concerned that the strength of this argument is diminished given the proposed requirements are not limited to PIRP resources, but rather extends to all eligible intermittent resources.

If the CAISO does chose to pursue the 1mw forced outage reporting threshold for the eligible intermittent resources, then PG&E strongly recommends that some parity of treatment for intermittent resources must nonetheless be extended with respect to possible enforcement actions associated with forced outage reporting. Specifically, any penalties, external reporting or other sanctions should not be imposed on this class of forced outage reporting requirements (1-10mw of forced outages for eligible intermittent resources).

For follow-up or questions, please contact Kevin Coffee (415-973-7631) or Glenn Goldbeck (415-973-3235).

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<sup>1</sup> Wind facilities with existing or approved meteorological station tower configurations prior to the effective date of the proposed tariff change would be grandfathered and not compelled to alter those configurations.