


Resource Transitions

Resource Adequacy Deliverability Assessment for Resources Transitioning from Outside to Inside the ISO Balancing Authority Area

Submitted by	Company	Date Submitted
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Background

The CAISO intends to create a process whereby it can establish the RA deliverability of an external resource that becomes internal resource because of change to the boundary of the CAISO grid.¹ Specifically, the CAISO proposes to:

- Grant the resource, on a permanent basis, a MW value of deliverability status that reflects its contribution to the RA deliverability on the associated inertia.² If the resource wants to obtain full capacity deliverability status up to its QC value, it would have to utilize the Generation Interconnection Process (GIP) to obtain the additional MW.

Comments

1. Do you have any concerns with the draft final proposal, and if so please describe.

As explained in prior comments, PG&E supports the CAISO's proposal.³ Given that the location of the resource's interconnection point will not change, there is no need to impose the requirement that the resource perform a GIP study to justify its RA deliverability.

Further, using historical data to determine the resource's contribution to RA deliverability on the inertia should provide a reasonable estimate of its new RA capacity value.

¹ CAISO has decided to limit the scope of this stakeholder process to only deal with expansion of the BAA. This stakeholder process is no longer contemplating a scenario in which the resource changes its point of interconnection.

² Specifically, the prior two years of historical flows is examined during high load periods. The sample hours are selected by choosing hours with the highest total import level when peak load was at least 90% of the annual system peak load.

³ See link to PG&E's comments supporting the CAISO's Straw Proposal:
<http://www.caiso.com/2b5d/2b5d88984c790.pdf>

2. If you have any additional comments, please provide them here.

PG&E does not have any additional comments.