



Stakeholder Comments Template

Ancillary Services Focus Group 3

This template has been created for submission of stakeholder comments on the Ancillary Services Focus Group 3, which took place on June 25, 2025. The meeting presentation and other information related to this initiative may be found on the [CAISO.com calendar](https://www.caiso.com/calendar) and under [Miscellaneous Meetings](#).

Upon completion of this template, please submit it to ASnotifications@caiso.com.

I

Submissions are requested by close of business on **July 9, 2025**

Submitted by	Organization	Date Submitted
<i>Tiffany Bloom</i> <i>Tiffany.bloom@pge.com</i>	<i>Pacific Gas & Electric</i>	<i>7/9/2025</i>

Please provide your organization's comments on the following issues and questions.

1. Please provide your feedback on the Ancillary Services Focus Group 3, held on June 25, 2025.

PG&E is in agreement with the California Independent System Operators (CAISO) new proposal to remove the use of an attestation as a way to prove Ancillary Service (AS) capabilities and instead utilize CAISO Business Practice Manual (BPM) and/or CAISO Tariff language updates allowing other means of verification such as data requests or Scheduling Coordinator (SC) initiated AS testing.

In the BPM and/or Tariff language updates, PG&E would like to ensure the language is clear for the following items:

If at the end of three (3) years, CAISO is unable to test A/S capabilities and submits a data request to SC's:

- We would like to ensure that it is clear that SC's will still have the ability to schedule an AS test in lieu of replying to the data request
- How long will SC's have to test a resource or respond to the data request after receipt of the request?
- What type of data and parameters of passing or failing will CAISO be requesting for SC's to submit?
- What will be the repercussions placed on SC's or generator owners if the data request is not responded to during the specified timeframe as set forth by CAISO?