

## Comments of Pacific Gas and Electric Company

RMR Designation: Agnews Power Plant

Stakeholder Conference Call

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company (PG&E) appreciates the California Independent System Operator's (CAISO) stakeholder call and presentation that was held on May 18, 2021 to review and discuss the Reliability Must-Run designation to the Calpine's Agnews Power Plant. PG&E offers the following comments on the designation:

- The CAISO has not justified the basis of considering local requirements to supersede other reliability requirements that are being met simultaneously including the system wide deficiency.
- Agnews noticed their intention of mothballing in November 2020 to permit Calpine to make business decisions regarding their resources. During this time the CAISO did not evaluate or consider alternatives to the RMR designation to mitigate the reliability need. PG&E would like to understand why alternative solutions to mitigate the identified need were not contemplated? For future mothball requests, can the CAISO evaluate or consider alternatives to designating the resource as an RMR?
- The RMR designation for the remainder of 2021 and 2022 exceeds the one-year tariff authority for RMR designations. Additionally, it is unclear of the reliability need being met for the remainder of 2021 when the basis of the need was from the summer peak load assumptions forecasted in the LCT study results.