

## Comments of Pacific Gas and Electric Company

### *Reliability Services Initiative – Revised Draft Tariff Language*

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company (PG&E) offers the following comments on the California Independent System Operator's (CAISO) Reliability Services Initiative (RSI) May 8, 2015 Revised Draft Tariff Language. PG&E's comments are divided into three sections:

- "Substantive Concerns" identifies elements of the proposed Tariff that diverge from the February 27, 2015 RSI Addendum to the Draft Final Proposal (RSI Proposal);
- "Requests for Clarification" indicates elements of the proposed Tariff that are unclear; and
- "Small Inaccuracies" identifies minor typographical errors and inaccurate Tariff section references.

We look forward to discussing PG&E's concerns and clarification requests on the stakeholder call scheduled for May 19, 2015.

#### 1. Substantive Concerns

##### a. **The revised tariff language should not remove the 8:00 A.M. deadline for providing day-ahead substitution.**

The proposed tariff language in Section 40.9.3.6(c)(1) addresses the timing of providing day-ahead substitution. The April 16, 2015 RSI Draft Tariff Language accurately reflected the RSI Proposal which specifies that requests for substitution in the day-ahead market must be submitted prior to 8:00 A.M. The May 8, 2015 RSI Revised Draft Tariff Language deviates from the RSI Proposal and changes this requirement so that requests for substitution in the day-ahead market must be submitted prior to the timeline specified in the Business Practice Manual. PG&E does not support this change in the Revised Draft Tariff Language and requests that the CAISO include the 8:00 A.M. deadline in the language as originally proposed and as specifically approved in the RSI Proposal.

#### 2. Requests for Clarification

##### a. **The CAISO should clarify in Section 40.9.2 that non-RA resources are not subject to the RAAIM.**

3. Small Inaccuracies

- a. The CAISO should include “and RA Plans” after “Supply Plans” in Section 40.9.2(c).
- b. The heading in Section 40.6.4.3.2(b) should be “Determination of Non-Dispatchable Use-Limited Status” and not “Determination of Non-Dispatchable Status”.
- c. Section 40.9.3.2(e) should refer to “Resource Flexible RA Capacity Plan” and not “Resource RA Flexible Capacity Plan”.