



## Pacific Gas and Electric's Comments on Generated Bids and Outage Reporting for Non-Resource Specific Resource Adequacy Resources Tariff Language

Submitted by			Date Submitted
Bahaa Seireg	(415) 973-0541	<a href="mailto:blst@pge.com">blst@pge.com</a>	July 26, 2011

Pacific Gas & Electric (PG&E) appreciates the opportunity to submit comments regarding the Generated Bids and Outage Reporting for Non-Resource Specific Resource Adequacy Resources (NRS-RA) Tariff Language.

### PG&E Comments

#### Section 9.3.10.6.1

The outage reporting thresholds for NRS-RA specified in Section 9.3.10.6.1 should be made consistent with those thresholds specified for resource-specific units in Sections 9.3.10.3.1 and 9.3.10.6 (duration and quantity of outage). In order to make these tariff sections consistent with one another, PG&E recommends that the following changes be made to the CAISO's proposed language in Section 9.3.10.6.1:<sup>1</sup>

~~Non-Resource Specific System Resources that provide Resource Adequacy Capacity shall report to the CAISO through the outage management system any Forced Outage of a Generating Unit or Forced Outage or Constraint of transmission facilities external to the CAISO Balancing Authority Area that directly results in the inability of the resource to deliver all or a portion of the Resource Adequacy Capacity identified in the resource's Supply Plan to the CAISO Balancing Authority Area. With respect to NRS-RA resources, in the event of a Forced Outage of a Generating Unit or transmission facilities external to the CAISO Balancing Authority Area that lasts fifteen (15) minutes or longer of 40 MW or more below the value specified in the Supply Plan and ten (10) percent of the value specified in the Supply Plan, the Operator shall provide to the CAISO an explanation of the Forced Outage and the estimated return time, within two (2) Business Days after the Operator initially notifies the CAISO pursuant to Section 9.3.10.3.1<sup>2</sup>.~~ Non-Resource Specific System Resources that provide Resource

<sup>1</sup> PG&E's recommended addition to Section 9.3.10.6.1 is found in Section 9.3.10.6 and represented by underlined text. Its recommended deletion is represented by strikethrough text.

<sup>2</sup> Section 9.3.10.3.1 (in bold) states the requirement to report a forced outage in (60) minutes. Thus, by including a reference to this tariff section, this portion of the CAISO's proposed language (in strikethrough text) can be deleted.

~~Adequacy Capacity are required to provide to the CAISO notice of the Forced Outage or Constraint within sixty (60) minutes after becoming aware of the circumstance and an explanation of the Forced Outage or Constraint within two (2) Business Days after providing the notice.~~