

**Transmission Induced Generator Outages:
Revised White Paper**

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the CAISO’s *Transmission Induced Generator Outages: Revised White Paper*.

PG&E appreciates the CAISO incorporating stakeholder feedback in modifying the proposed tariff revisions to support all outages that are beyond the resource owner’s control.

PG&E generally supports the below proposed language to modify section 40.9.3.4(d) of its tariff.

Although it is implicit in the statement “a cause outside of the control of the resource owner,” PG&E would like the CAISO to consider revising the language to clarify what that statement would entail (*see red text below*):

Exclusions from RAIM for certain Outage types. The RAIM Availability Assessment excludes the capacity, duration, and must-offer requirement for local and/or system Resource Adequacy Capacity or Flexible RA Capacity on an Outage in a nature of work category relating to an administrative action by the resource owner, a cause outside of the control of the resource owner (e.g., transmission-induced outages, gas pipeline restrictions, etc.), or a short-term use limitation, as those categories are specified in the Business Practice Manual.

As for broader outage management matters, PG&E looks forward to further collaboration and discussions with the CAISO.