



PG&E's Comments on Multi-Stage Generating Resource Draft Tariff Language

Submitted by	Date Submitted
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Pacific Gas & Electric Company (PG&E) appreciates the opportunity to comment Multi - Stage Generating Resource (MSG) Draft Tariff Language.

COMMENTS

1) Section 8.4.1: Operating Characteristics Required to Provide Ancillary Services.

CAISO Proposed Tariff Language

Scheduling Coordinators for Multi-Stage Generating Resources must comply with the certification requirements in Section 8, Appendix K of the CAISO Tariff, and the Business Practice Manuals at the configuration levels and Scheduling Coordinators can only submit Ancillary Services Bids or Submissions to Self-Provide Ancillary Services into the CAISO Markets for the Multi-Stage Generating Resource configurations for which they are certified.

Comments

The proposed language above is confusing and should be broken into distinct sentences.

2) Section 11.8.1.3 (c): MSG Start-Up, Minimum Load, or Transition Costs

CAISO Proposed Tariff Language

*“If the CAISO commits the Multi-Stage Generating Resource in the IFM and RUC in the same configuration the ISO commits the Multi-Stage Generating Resource in RTM, then the Multi-Stage Generating Resource’s Start-Up Cost, Minimum Load Cost, and Transition Cost will be settled based on the **IFM or RUC Start-Up Cost, Minimum Load Cost, and Transition Cost** for the configuration committed in the IFM or RUC, described in Sections 11.8.2.1 and 11.8.3.1, and further determined pursuant to part (2) below.”*

Comments

This tariff section is not consistent with MSG Business Rule (BRQ114) which states:

The transition cost and minimum load cost will be evaluated following the order of RTM -> RUC -> IFM. If a transition cost or minimum load cost has been determined by that market, the eligibility for the subsequent market will not be considered.

3) Section 11.8.1.3 (2c): MSG Resource Start-Up, Minimum Load, or Transition Costs

CAISO Proposed Tariff Language

*“If the CAISO commits the Multi-Stage Generating Resource in the IFM in the same configuration the CAISO commits the Multi-Stage Generating Resource in RUC, then Multi-Stage Generating Resource’s Bid Costs will be based on the **IFM Start-Up Cost, Minimum Load Cost, and Transition Cost** for the configuration committed in the IFM as described in Section 11.8.2.1.”*

Comments

This tariff section is not consistent with MSG Business Rule (BRQ114) which states:

The transition cost and minimum load cost will be evaluated following the order of RTM -> RUC -> IFM. If a transition cost or minimum load cost has been determined by that market, the eligibility for the subsequent market will not be considered.

4) Section 27.8.1: Registration and Qualification

CAISO Proposed Tariff Language

“After the submission of a request for change in status or configuration definitions by a Scheduling Coordinator, the CAISO will coordinate with the responsible Scheduling Coordinator to validate that the resource qualifies for the requested status and that all the requisite information has been successfully provided to the CAISO (...).”

Comments

The CAISO should clarify its timeline for validating a resource’s status with the responsible Scheduling Coordinator.

5) Section 31.5.1.4: Eligibility to Set the RUC Price

CAISO Proposed Tariff Language

“All resources that are eligible for RUC participation as described in Section 31.5.1.1 with RUC Bids that are unconstrained due to Ramp Rates or other temporal constraints, including Multi-Stage Generating Resource transitions, are eligible to set the RUC Price.”

Comments

There is no proposed language regarding Forbidden Operating Regions"(FORs); since FORs are not considered marginal when in transition, we would like the CAISO to clarify if FOR units can or cannot set the RUC Price.

6) Section 34.9: Exceptional Dispatch

CAISO Proposed Tariff Language

The CAISO has not proposed language for this section of the Tariff.

Comments

This section was not included in the proposed MSG Tariff language; proposed tariff language should be added to reflect MSG Business Rule (BRQ105) which discusses the inclusion of Transition Costs for MSG units that are Exceptionally Dispatched.

7) Section 34.2: Real-Time Unit Commitment

CAISO Proposed Tariff Language

In any fifteen minute RTUC interval that a Multi-Stage Generating Resource is in transition, the CAISO: (1) will not award any incremental Ancillary Services; (2) will disqualify any Day-Ahead Ancillary Services Awards; (3) will disqualify Day-Ahead qualified Submissions to Self-Provide Ancillary Services Award, and (4) will disqualify Submissions to Self-Provide Ancillary Services in RTM (...).”

Comments

The tariff language above is not supported by current Business Rules. Will revisions to Business Rules be provided?

8) CAISO Tariff Appendix A

Comments

Appendix A does not include a definition of RUC Transition cost.

9) Miscellaneous

Comments

Tariff Section 11.8 CAISO's proposed language often includes the phrase "the CAISO will evaluate". The CAISO should identify the relevant tariff section that explains its evaluation methodology when using this phrase."

For example, Section 11.8.3.1.1 (a) states:

*"An actual Start-Up is detected between two consecutive Settlement Intervals when the relevant metered Energy in the applicable Settlement Intervals increases from below the Minimum Load Energy and reaches or exceeds the relevant Minimum Load Energy. The Minimum Load Energy is the product of the relevant Minimum Load and the duration of the Settlement Interval. **The CAISO will evaluate the Minimum Load Energy for Multi-Stage Generating Resources based on the CAISO-committed configuration.**"*

This language in bold is unclear. The CAISO should identify the relevant tariff section that explains the how the CAISO will evaluate Minimum Load Energy for MSG Resources.