



## 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 11.8.1.3 1(a): Multi-Stage Generating Resource Start-Up, Minimum Load, or Transition Costs**

##### CAISO Proposed Tariff Language

*IFM Commitment Period and/or RUC Commitment Period MSG Configuration(s) are different than the RTM CAISO Commitment Period MSG Configuration, the Multi-Stage Generating Resource's Start-Up Cost, Minimum Load Cost, and Transition Cost will be settled based on the RTM CAISO Commitment Period MSG Configuration Start-Up Cost, Minimum Load Cost, and Transition Cost as described in Section 11.8.4.1.*

##### Comments

As is done in other sections, the language above should define whether IFM and RUC Commitment Period is a CAISO or Self Commitment.

#### **2) Section 11.8.1.3 1 2(a): Multi-Stage Generating Resource Start-Up, Minimum Load, or Transition Costs**

##### CAISO Proposed Tariff Language

*"IFM Commitment Period MSG Configuration is different than the RUC CAISO Commitment Period MSG Configuration ~~than~~, then the Multi-Stage Generating Resource's Start-Up Cost, Minimum Load Cost, and Transition Cost will be settled based on the RUC CAISO Commitment Period MSG Configuration Start-Up Cost, Minimum Load Cost, and Transition Cost as described in Section 11.8.3.1"*

### Comments

As is done in other sections, the language above should define whether IFM Commitment Period is a CAISO or Self Commitment. Also, the word “than” (which is in red text) should be deleted.

### **3) Section 30.5.1 (k): General Bidding Rules**

#### CAISO Proposed Tariff Language

*For any given Trading Hour, a Scheduling Coordinator may submit Self-Schedules and/or Submissions to Self-Provide Ancillary Services in only one Multi-Stage Generating Resource registered MSG Configuration. If in any given Trading Hour the Multi-Stage Generating Resource was awarded Regulation or Operating Reserves in the IFM, any Self-Schedules or Submissions to Self-Provide Ancillary Services the Scheduling Coordinator submits for that Multi-Stage Generating Resource in the RTM must be for the same MSG Configuration for which Regulation or Operating Reserve is Awarded in IFM for that Multi-Stage Generating Resource in that given Trading Hour*

### Comments

The language above does not match our previous understanding of the constraints on MSG units in RT bidding, per the draft final proposal section 4.2, which states:

*To reiterate, the main limitations, in addition to the number of configurations that participants may bid into real time for an MSG unit, are the requirements as follow:*

- 1. At least one configuration’s bid must be sufficient to cover any day-ahead energy schedule **and** any Resource Adequacy must-offer obligation;*
- 2. At least one configuration’s bid must be sufficient to cover any Residual Unit Commitment schedule or award **and** transition to this configuration must be feasible given the configurations bid into the previous hour;*
- 3. All configurations bid into real time must reserve capacity to fulfill day-ahead ancillary services awards;*
- 4. Configurations bid into the real time market for a particular hour can be feasibly transitioned between one another by the 15-minute unit commitment that occurs in real time; and*
- 5. At least one configuration bid into the real-time market must be feasible given the configurations bid into the previous hour.*

As multiple configurations may satisfy the IFM awards of energy, AS and RUC, we believe the language in 4.2 indicates that any configuration satisfying the awards should "cover" the awards, and that therefore a bid in the configuration specifically awarded by the ISO's IFM should not be required to be bid in the real-time. It is our understanding that in the Markets and Performance stakeholder meeting, the CAISO committed to address this issue.

#### **4) CAISO Tariff Appendix A**

##### Comments

RUC Bid Cost is not redefined to include RUC Transition cost as done for IFM and RTM Transition Cost.