



## Comments of Pacific Gas and Electric Company Regulatory Must-Run Pump Load

Submitted by	Company	Date Submitted
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PG&E appreciates the opportunity to submit the following comments on the CAISO's Draft Final Proposal on Regulatory Must-Run Pump Load.

### **PG&E Does Not Object to the Proposal**

PG&E does not object to the CAISO's proposal to create a new scheduling priority class in the IFM with a penalty price of \$5100/MWh in the scheduling run and \$750/MWh in the pricing run, and expanding the definition of Regulatory Must-Run to include "applicable pump load." This is a reasonable approach to ensure that these resources will not be curtailed in violation of federal or state regulations as Existing Transmission Contracts expire.

PG&E also appreciates and supports the addition of an annual certification process. This process will help ensure that the expanded definition will apply only to those pump loads with an obligation under federal or state law.