



Comments of Pacific Gas and Electric Company on the CAISO's Reply to Appeals of PRR 854

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company (PG&E) provides a brief reply to the CAISO's response to appeals of proposed revision request (PRR) 854 of the Reliability Requirements Business Practice Manual (BPM). PG&E continues to stand by the arguments made in its December 18, 2015 Appeal, particularly its concern that the CAISO has yet to provide any definition to the degree to which a resource must be capable of pre-dispatch to forego a 20-minute dispatchability requirement. Further, PG&E does not concede that the CAISO's response to appeals adequately addresses all of the issues raised by the appealing parties. However, PG&E is encouraged by the CAISO's willingness to work with the utilities to define pre-dispatch requirements for resources to provide local reliability, and prefers to work collaboratively with the CAISO and the other utilities to achieve this.