



Stakeholder Comments Template

CAISO Reliability Demand Response Resource Minimum Run Time: Issue Paper/Draft Final Proposal

This template has been created for submission of stakeholder comments on the CAISO Reliability Demand Response Resource Minimum Run Time stakeholder call is scheduled on December 20, 2023. The meeting presentation and meeting recording for this initiative have been posted to the miscellaneous stakeholder meetings [webpage](#).

Upon completion of this template, please submit it to ISOStakeholdersAffairs@caiso.com. Submissions are requested by close of business on **Dec 18, 2023**.

Submitted by	Organization	Date Submitted
<i>Elizabeth Lopez (202-903-4533)</i>	<i>Pacific Gas & Electric</i>	<i>December 18</i>

Please provide your organization’s comments on the following issues and questions.

1. Do you believe the proposed changes will address the three identified issues in the paper?

PG&E appreciates the CAISO’s acknowledgement that the promulgation of D.23-06-029 has created concerns over the potential overutilization of RDRR resources, and associated attrition of customers from the Base Interruptible Program, resulting in reduced RDRR capacity.

PG&E supports any efforts that enable the physical operating characteristics of RDRR resources to be properly accounted for during market optimization.

PG&E also believes CAISO’s future adherence to the minimum on time constraint when dispatching RDRRs, via market awards or exceptional dispatch, is critical to alleviating participant concerns.

2. Please provide any Tariff amendments comments.
3. Recognizing this is a very limited scope to meet the accelerated timeline, what additional Reliability Demand Response Resource Minimum Run Time enhancements in the future would you like to see and why?