

May 27, 2025

**Pacific Gas & Electric (PG&E) Stakeholder Comments**  
**Re: CAISO's Ancillary Services Focus Group 2 hosted by CAISO on 5/5/2025**

Submitted by: Tiffany Bloom, [tiffany.bloom@pge.com](mailto:tiffany.bloom@pge.com)

PG&E does not support the California Independent System Operator (CAISO) proposal to sign an Ancillary Services (AS) attestation in preference over testing of AS certified resources to prove AS performance capabilities.

PG&E understands that the CAISO is facing challenges in ensuring testing for 100% of its resources certified to provide AS within a reasonable timeframe. Between the first and second AS focus group, CAISO listened to stakeholder comments and proposed a shift of attestation burden from scheduling coordinators (SC) to generator owners. While this shift aligns operationally to the items being attested, PG&E believes that the CAISO Tariff, Operating Procedures, and Business Practice Manuals currently state the resource's responsibility explicit to Ancillary Services and any CAISO product. Requiring a signature adds no meaningful value and does not enhance compliance, reliability or accountability. An alternative approach would be for the CAISO to inform market participants via trainings of the current expectations set forth in the CAISO Tariff, Operating Procedures, and Business Practice Manuals. This proactive approach would better serve the CAISO and ensure proficiency.

PG&E understands that testing can require burdensome resources and tools. However, as part of CAISO's role, testing is an essential part of ensuring the grid's success. The CAISO Tariff gives CAISO the authority to audit and test resources that Bid or Self-Provide AS. The requirement of a bid or self-provision of AS in order to conduct a test or audit appears to be one of the primary limiting factors in CAISO's success with testing 100% of its resources that provide AS. With CAISO's openness to evaluate alternative ways to validate that AS resources can appropriately respond to and provide their certified AS amounts, PG&E suggests an alternative approach where SC's are given a reasonable specified timeframe where AS performance is required to be made available via the pre-existing tariff guidelines of offering a bid or self-providing AS. In instances where it is still unrealistic for the CAISO to conduct a test due to market conditions, a provision to permit SCs to schedule an AS test would be permitted within the same reasonable specified timeframe as determined by CAISO. This solution would allow verified AS values to be put on the grid in conditions that would properly reflect dispatch conditions and controls (in instances such as regulation). This solution will also substantiate generation values in accordance to verified Masterfile AS values.

Outside of PG&E's general comments and suggestions to the current CAISO attestation proposal, PG&E has concerns regarding the attestation being implemented via CAISO Operating Procedure rather than having a more thoughtful and thorough approach of submitting this proposal via Tariff or BPM change. Through the AS Focus Group calls, it was apparent that CAISO has a general understanding of how the attestation would fit into the pre-existing AS performance and testing process, however the "Attachment A: Attestation Criteria" and "Ancillary Services Provider Attestation" document fails to outline repercussions/penalties for not providing a signed attestation with the requested 90 day period, guidelines for potential rescission of payments, or failure to provide following the submittal of a signed attestation. PG&E feels these critical details cannot be properly reflected via Operating Procedure.

In addition, a review of "Attachment A: Attestation Criteria" was completed and PG&E proposes to add the following in red:

FOR ALL ANCILARY SERVICES PRODUCTS, fifth bullet point:

The **Resource and the** Resource's scheduling coordinator has the ability to see real-time contingency dispatch signals from the CAISO's automated dispatch system.

REGULATION UP AND REGULATION DOWN; third bullet point:

The resource must be able to linearly increase or decrease real power levels immediately in response to signals from the CAISO's energy management system control **in alignment with the resources tested regulation ramp rate as stated in the CAISO Master File.**