

A/S Desk,

Below is PG&E's response following the Ancillary Services Focus Group 1 hosted by CAISO on 3/31/2025.

Summary of the issue as we understand it:

CAISO is unable to ensure testing for 100% of its resources currently certified to provide A/S. Some reasons are that resources get awarded during peak times preventing actual testing in RT due to the market having a need for the capacity that is reserved or that resources do not get awarded (or are not bid into the A/S market) preventing an ability to test for a certified ability due to lack of market accessibility. It also sounds like the CAISO Real Time Operations Desk may have some issues with SC's not understanding dispatch requirements for A/S resource dispatching.

CAISO is suggesting the use of an SC attestation, where SC's confirm their ability to:

- Reliably provide capacity that was last certified for each applicable A/S product and resource
- Ensure resources are fully compliant with the applicable CAISO direct telemetry standards
- Perform self assessments of ability to perform
- Confirm resource communication and controller equipment is properly set up

Comments:

- PG&E does not believe that an attestation will improve the reliability of a resource providing A/S
 - PG&E feels it's better suited to remind all market participants of the current tariff language
- For resources who are certified for A/S but unable to be tested or verified for reasons stated in the summary, PG&E feels CAISO should place a timeline requirement (for example, 1/2/3 years etc.) to self provide for an A/S service or schedule a test with the CAISO A/S desk to prove A/S capability

Thank you,
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