



Comments of Pacific Gas and Electric Company Draft Final Proposal Seven-Day Advanced Outage Submittal

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company (PG&E) welcomes the opportunity to participate and submit comments in the stakeholder process for the California Independent System Operator's (CAISO) Seven-Day Advanced Outage Submittal.

Comments

Clarifications on PG&E's Points of Inquiry Appreciated

PG&E appreciates the CAISO clarifying in its Draft Final Proposal (proposal) several points on which PG&E had questions. These clarifications include the following:

- 1) The proposal does not apply to emergency or reliability work.
 - "The proposal is...not intended to preclude the submission of emergency work for equipment that has failed in service, is in danger of imminent failure, or is urgently needed to protect personnel." (Draft Final Proposal, Section 5.2, p. 7, second to last paragraph, last sentence)
- 2) Long Term Outages, those that are submitted to the CAISO with at least 30 days notice, are considered "Planned" outages as part of the CAISO proposal.
 - "The ISO encourages PTOs to submit outage requests up to 15 months in advance...By definition, outages submitted in that time frame are considered to be included as "Planned" outages, as long as they have sufficient detail for the ISO to properly assess them seven days, or more prior to the start of the outage." (Draft Final Proposal, Section 5.2, p. 8, first full paragraph)

Further Clarification Sought on Planned Outages Affected by Changes Within Seven-Day Window

PG&E seeks further clarification on how one other issue would be affected by the proposal. How would a complex electric transmission outage/project planned well in advance (e.g., Long Range) requiring a complicated series of clearances be affected by schedule changes within the seven-day window caused by “external” events outside of the given project, or by “internal” events having to do with the given project? In other words, how will the CAISO accommodate schedule changes for projects, particularly reliability projects, where the utility has submitted the proposed work in advance of the window required under the proposal, but where unforeseeable subsequent events necessitate schedule changes?

Examples of “external” events that could result in a given project delay are delays due to other projects taking precedence, or inclement weather forestalling work.

Examples of “internal” events that could result in a given project delay are delays due to the results of a given project test, supply/resource delays/shortages, or slipped scheduled dates within the given project.

Both external or internal delays might delay the start of a project or cause schedule changes once work has commenced, requiring additional outages and/or rescheduling of planned outages. For example, once work has commenced on a project, uncontrollable and unforeseeable events (equipment delays, weather conditions, etc.) could prevent completion on time. No advance planning could anticipate all such possible delays without unduly and unreasonably extending the timing for a planned outage, which would cause reliability impacts.

Especially for reliability projects, the CAISO's proposal should confirm that there will be accommodation for rescheduling outages within the seven day window under such uncontrollable and unforeseeable circumstances.