

## Stakeholder Comments: Aliso Canyon Gas Electric Coordination Straw Proposal

Submitted by	Company	Date Submitted
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Wellhead appreciates the opportunity to provide comments to the Aliso Canyon Gas Electric Coordination Straw Proposal.

In general, Wellhead continues to support all of the CAISO proposals: however, Wellhead is not in agreement with the CAISO's opinion to remove the Gas Balancing Constraint. Wellhead continues to support the Gas Balancing Constraint as an appropriate tool to manage an area's gas burn within a balancing band. Wellhead understands CAISO's position that the gas balancing constraint may be somewhat redundant with SoCal Gas balancing mechanisms, but we strongly disagree that it would result in dispatches that would be in conflict with those mechanisms. As CAISO has correctly stated, any balancing requirements (and associated penalties) will have the biggest impact on the fast start units committed in RT who have no opportunity to nominate any gas. The Gas Balancing Constraint will, at a minimum, give the CAISO (and by extension its participants) a mechanism to avoid using affected fast start units during OFO periods. Without this constraint, the fast start units face certain penalties without any clear path to cost recovery.