

Comments of Pacific Gas and Electric Company

Energy Imbalance Market Year 1 Enhancements - Draft Tariff Language

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company (PG&E) offers the following comments on the California Independent System Operator's (CAISO) Energy Imbalance Market (EIM) Year 1 Enhancements Initiative April 15, 2015 Draft Tariff Language. PG&E's comments request two clarifications of elements of the proposed Tariff that are unclear.

We look forward to discussing PG&E's clarification requests on the stakeholder call scheduled for May 4, 2015.

1. Requests for Clarification

a. **The proposed Tariff language in Section 29.17(f)(3) could over constrain EIM transfers.**

The proposed Tariff language in Section 29.17(f)(3) indicates that the CAISO will use the lowest EIM Transfer limit communicated by all EIM Entity scheduling coordinators (SCs) at EIM internal interties shared among EIM Entity BAAs. If an EIM Entity communicates an EIM Transfer limit that is based on the share of the intertie that the EIM Entity can use, and not the Transfer limit available for use by all EIM Entities that may use the intertie, the EIM transfer could be constrained more than is necessary. The CAISO should clarify that it intends to use the lowest EIM Transfer limit on an intertie with multiple EIM Transfer limits only when each EIM Entity on that intertie communicates the total Transfer limit for all possible users of the intertie.

b. **The proposed Tariff language in Section 29.34(m)(4)(E)(ii) should include specificity as to how the additional incremental and decremental requirements for the resource sufficiency evaluation will relate to the histograms that the CAISO will calculate for the percentage of the difference between imports and exports scheduled at T-40 and the final imports at T-20.**

The proposed Tariff language in Section 29.34(m)(4)(E)(ii) states that on a monthly basis, according to procedures set forth in the Business Practice Manual for the EIM, the CAISO will calculate for each EIM Entity BAA histograms of the percentage of the difference between imports and exports scheduled at T-40 and the final imports at T-20 and calculate additional incremental and decremental requirements for the capacity test component of the resource

sufficiency evaluation. The proposed language is not sufficient to understand how the CAISO will set the additional incremental and decremental requirements based on the calculated histograms. The CAISO should include specific language on the basis for how the additional incremental and decremental requirements will be set.