Comments of Pacific Gas & Electric Company

Excess Behind the Meter Production – Draft Tariff Review

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 Corporation's (CAISO) Excess Behind the Meter (BTM) Production – Draft Tariff Language.

PG&E is generally supportive of the CAISO's proposed tariff amendments but provides the following comments and suggested edits:

1. The CAISO should provide additional implementation detail prior to filing any tariff revisions to FERC to avoid unintended consequences or the need to file revisions. PG&E and other stakeholders will likely have significant process and system changes that need to be worked through before this change can be fully implemented.

2. The CAISO should consider the timing of implementing "gross load" into its Transmission Access Charge rate calculation when all Participating Transmission Owners (PTOs) are able to implement the clarification into their utility-specific rates, to ensure consistency. Sales forecasts are developed well in advance of the rate effective year; PG&E anticipates that its sales forecast can be updated for a January1, 2022 effective date.

3. PG&E requests additional review of Appendix F, Schedule 3, to ensure what, if any, corresponding changes to a PTO's Tariff may be necessary.

4. PG&E offers a series of minor suggested language changes and comments requesting clarity via redlines to the redline version below.

APPENDIX A

Excess Behind the Meter Production

Energy from an End-Use Customer in excess of its onsite Demand

Gross Load

~~For the purposes of calculating the transmission Access Charge, Gross Load is all Energy~~ Demand (adjusted for distribution losses) ~~delivered for the supply~~ of End-Use Customer Loads directly connected to the transmission facilities or directly connected to the Distribution System of a Utility Distribution Company or MSS Operator located in a PTO Service Territory. Gross Load includes Load served by Excess Behind the Meter Production. Excess Behind the Meter Production shall not be netted against End-Use Customer Load in determining Gross Load.~~Excess Behind the Production is not a component of Gross Load, and shall not be netted against End-Use Customer Load in determining Gross Load.~~ Gross Load ~~shall~~ excludes:

(1) Load with respect to which the Wheeling Access Charge is payable;

(2) Load that is exempt from the Access Charge pursuant to Section 4.1 of Appendix I; ~~and~~

(3) ~~the portion of the~~ Load of an individual retail customer served by its own onsite Generating Unit or energy storage device, or as authorized by Section 218 of the California Public Utilities Code;

~~of a Utility Distribution Company, Small Utility Distribution Company, or MSS Operator that is served by a Generating Unit that: (a) is located on the customer's site or provides service to the customer's site through arrangements as authorized by Section 218 of the California Public Utilities Code;~~

(~~4b~~) Onsite Load served by ~~is~~ a qualifying small power production facility or qualifying cogeneration facility, as those terms are defined in the FERC's

regulations implementing Section 201 of the Public Utility Regulatory Policies Act of 1978; and

(5e) Load secureds by Standby Service from a Participating TO under terms approved by a Local Regulatory Authority or FERC, as applicable, or can be curtailed concurrently with an Outage of the Generating Unit serving the Load.

Gross Load forecasts consistent with filed Transmission Revenue Requirements will be provided by each Participating TO to the CAISO. For purposes of this definition, Generating Units, storage devices, and Loads will be considered onsite where they share, or are sub-metered behind, the same meter.

SECTION 11

11.10.7 Voltage Support

The Voltage Support user rate for any Settlement Period shall be calculated based on the sum of Voltage Support payments made to Scheduling Coordinators in accordance with Section 11.10.1.4, divided by ~~Measured Demand~~Gross Load, excluding metered Demand inside an MSS except as provided by Section 4.9.4.4. The Voltage Support charge for any Settlement Period payable by a Scheduling Coordinator is the Voltage Support user rate multiplied by the quantity of ~~Measured Demand~~Gross Load, excluding Demand within an MSS except as provided by Section 4.9.4.4, for which that Scheduling Coordinator is responsible in that Settlement Period.

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11.11 RACs and Wheeling Transactions

11.11.1 Regional Access Charge

Regional Access Charges will be levied in accordance with Section 26.1 and Appendix F, Schedule 3.

11.11.2 Wheeling Through and Wheeling Out Transactions

The CAISO shall calculate, account for and settle charges and payments for Wheeling Through and Wheeling Out transactions in accordance with Section 26.1.4 and Appendix F, Schedule 3, Section 14.

11.11.3 Reporting Gross Load and Excess Behind the Meter Production

In reporting Gross Load to the CAISO, each UDC's Scheduling Coordinator also will report the extent to which Excess Behind the Meter Production served that Gross Load. The value for Excess Behind the Meter Production will be reported as a separate value, and Scheduling Coordinators for UDCs must include Load served by Excess Behind the Meter Production in reporting Gross Load. The CAISO will use Excess Behind the Meter Production values for informational purposes and to ensure Scheduling Coordinators for UDCs report Gross Load accurately. The CAISO will publish Excess Behind the Meter Production values on OASIS.

Commented [A1]: Should be LSE (Load Serving Entity). UDCs do not take on the role of being the scheduling coordinator. LSE has that responsibility.

Commented [A2]: Should be LSE (Load Serving Entity).

Commented [A3]: Should be LSE (Load Serving Entity).

Commented [A4]: Suggest using the word "consistently" instead. Accuracy depends on definition and the different interpretation of that definition. The overarching purpose of this initiative, as PG&E understand it, is to ensure consistency in reporting for cost allocation purposes.

Commented [A5]: Is the inclusion of publishing Excess Behind the Meter Production value on OASIS necessary to conform to any FERC requirements? Is there a reason why this isn't just in the BPM?

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11.18 Emissions Costs

11.18.1 Obligation to Pay Emissions Costs Charges

Each Scheduling Coordinator shall be obligated to pay a charge in accordance with this Section 11.18, which will be used to pay the verified Emissions Costs incurred by an Emissions Eligible Generator during a CAISO Commitment Period. The CAISO shall levy this administrative charge (the Emissions Cost charge) each month, against all Scheduling Coordinators based upon each Scheduling Coordinator's (1) Balancing Authority Area Gross Load, and (2) Demand within California outside of the CAISO Balancing Authority Area that is served by exports from

the CAISO Balancing Authority Area. Scheduling Coordinators shall make payment for all Emissions Cost charges in accordance with the CAISO Payments Calendar.

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Section 26

26. Transmission Rates and Charges

26.1 Access Charge

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(g) **Reporting Gross Load and Excess Behind the Meter Production.** In reporting Gross Load to the CAISO, each UDC's Scheduling Coordinator also will report the extent to which Excess Behind the Meter Production served that Gross Load. The value for Excess Behind the Meter Production will be reported as a separate value, and Scheduling Coordinators for UDCs must include Load served by Excess Behind the Meter Production in reporting Gross Load. The CAISO will use Excess Behind the Meter Production values for informational purposes and to ensure Scheduling Coordinators for UDCs report Gross Load accurately. The CAISO will publish Excess Behind the Meter Production values on OASIS.

Commented [A6]: Should be LSE (Load Serving Entity).

Commented [A7]: Should be LSE (Load Serving Entity).

Commented [A8]: Should be LSE (Load Serving Entity).

Commented [A9]: Suggest using the word "consistently" instead. Accuracy depends on definition and the different interpretation of that definition. The overarching purpose of this initiative, as PG&E understand it, is to ensure consistency in reporting for cost allocation purposes.

Commented [A10]: Is the inclusion of publishing Excess Behind the Meter Production value on OASIS necessary to conform to any FERC requirements? Is there a reason why this isn't just in the BPM?

Section 43A

43A.8.3 Collective Deficiency in Local Capacity Area Resources

If the CAISO makes designations under Section 43A.2.2 the CAISO shall allocate the costs of such designations to all Scheduling Coordinators for LSEs serving Load in the TAC Area(s) in which the deficient Local Capacity Area was located. The allocation will be based on the Scheduling Coordinators' proportionate share of Gross Load in such TAC Area(s) as determined in accordance with Section 40.3.2, excluding Scheduling Coordinators for LSEs that

procured additional capacity in accordance with Section 43A.2.1.2 on a proportionate basis, to the extent of their additional procurement.

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43A.8.5 Allocation of CPM Significant Event Costs

If the CAISO makes any CPM Significant Event designations under Section 43A.2.4, the CAISO shall allocate the costs of such designations to all Scheduling Coordinators for LSEs that serve Load in the TAC Area(s) in which the CPM Significant Event caused or threatened to cause a failure to meet Reliability Criteria based on the percentage of actual Gross Load of each LSE represented by the Scheduling Coordinator in the TAC Area(s) to total Gross Load in the TAC Area(s) as recorded in the CAISO Settlement system for the actual days during any Settlement month period over which the designation has occurred.

43A.8.6 Allocation of Exceptional Dispatch CPMs

If the CAISO makes any Exceptional Dispatch CPM designations under Section 43A.2.5, the CAISO shall allocate the costs of such designations to all Scheduling Coordinators for LSEs that serve Load in the TAC Area(s) in which the need for the Exceptional Dispatch CPM arose based on the percentage of actual Gross Load of each LSE represented by the Scheduling Coordinator in the TAC Area(s) to total Gross Load in the TAC Area(s) as recorded in the CAISO Settlement system for the actual days during any Settlement month period over which the designation has occurred.

43A.8.7 Allocation of CPM Costs for Resources at Risk of Retirement

If the CAISO makes any CPM designations under Section 43A.2.6 for resources at risk of retirement needed for reliability, the CAISO shall allocate the costs of such designations to all Scheduling Coordinators for LSEs that serve Load in the TAC Area(s) in which the need for the CPM designation arose based on the percentage of actual Gross Load of each LSE

represented by the Scheduling Coordinator in the TAC Area(s) to total Gross Load in the TAC Area(s) as recorded in the CAISO Settlement system for the actual days during any Settlement month period over which the designation has occurred.