



Comments of Pacific Gas and Electric Company

Draft 2021 Policy Initiatives Catalog

Submitted by	Company	Date Submitted
Pedram Arani	Pacific Gas & Electric	August 27, 2020

Pacific Gas and Electric Company (PG&E) offers the following comments on the California Independent System Operator Corporation’s (CAISO) Draft 2021 Policy Initiatives Catalog, published August 12, 2020.

PG&E generally supports the CAISO’s policy efforts directed at reaching California’s policy goals, but is concerned that issues involving the performance of CAISO’s existing markets and operations may not get the attention they deserve, or could create resource contention if the current initiatives and new proposals are included in 2021. The recent emergency grid conditions (with corresponding high market prices) experienced through August 2020 represent a statewide effort and renewed focus on meeting reliability. The CAISO is investigating and addressing issues that resulted from this recent experience. PG&E believes the CAISO should focus on and prioritize near-term key initiatives with the most potential to impact reliability and affordability for customers.

The CAISO should prioritize initiatives that support these focused objectives including a) resource adequacy reform, b) import RA rules, and c) market power mitigation. The CAISO should prioritize initiatives that can be implemented soon, in order to avoid future emergency grid conditions and help ensure our customers have reliable and affordable energy.