

**1. Provide your organization's summary on the intent of the Imbalance Reserves Mosaic Parameter Requirements initiative.**

PG&E understands that this is the first step in a multistep process toward the successful implementation of the imbalance reserves product and successful launch of EDAM. PG&E appreciates CAISO for considering previous stakeholder comments for additional engagement during the Imbalance Reserves Parameter tuning process and expects to continue this collaborative effort through to launch. We agree with CAISO's stated intent and commend CASIO as this analysis is thorough and well presented. CAISO has presented a strong enough case to move to the next step, but PG&E believes stakeholders should have the opportunity to wholistically evaluate all of the Imbalance Reserve Tuning parameters, including mosaic model parameter values, during parallel operations and the 'fine tuning' process.

Thank you PG&E for the comment; we appreciate your thoughts. At this time the goal is to set the parameters so they will not be changing throughout market simulation and parallel operations. If further comments come up during that process feel free to reach out via CIDI ticket and CAISO will determine the best path forward based on the comments.

**2. Provide your organization's comments on whether it is felt that there is sufficient existing information on mosaic quantile regression, utilized by CAISO for forming Imbalance Reserve (IR) requirement. If no, please provide where you would like to see further information and/or training.**

PG&E understands that this is the first step in a multistep process toward the successful implementation of the imbalance reserve products and successful launch of EDAM. This analysis is thorough and well presented. CAISO has presented a strong enough case to move to the next step.

Thank you for the participating and feedback throughout the process.

**3. Provide your organization's comments on the proposed testing approach to evaluate the Imbalance Reserve mosaic quantile regression parameters.**

PG&E believes CAISO has made good progress and reached reasonable conclusions based on its presentation. However, PG&E would like clarification on slide 28 of the presentation that cautions that the FRP and IR geographic diversity benefits are not directly comparable because the modeling of each product used different footprints. Why? It would seem beneficial to try to make the footprints equivalent or similar.

Thank you for the comment , the goal of this slide was to contextualize the reason why the diversity benefit, for example, may be smaller for this study because we are modeling a subset of the WEIM footprint due to a subset of participation in this process. Additionally, in an effort to make these results as reflective as possible we solicited DA archived demand, solar and wind forecast data from all participating BAAs. Alternatively put, CAISO did not opt to emulate DA forecast data for demand, solar and wind for BAAs that did not provide data, e.g. to have participation parity with the WEIM footprint.

**4. Provide your organization's comments on CAISO's draft recommendation of retaining initially specified sample scheme 4.**

PG&E appreciates CASIO's thorough analysis and believes that it has reached a reasonable conclusion to move on to the next step with Sample Scheme 4. However, stakeholders should have the opportunity to wholistically evaluate all of the parameters during parallel operations and the 'fine tuning' process.

Thank you PG&E for the comment; we appreciate your thoughts. At this time the goal is to set the parameters so they will not be changing throughout market simulation and parallel operations. If further comments come up during that process feel free to reach out via CIDI ticket and CAISO will determine the best path forward based on the comments.

**5. Provide your organization's comments on CAISO's draft recommendation of changing sample days from 180 days to 150 days.**

CAISO has presented a strong enough case to move to the next step, but we would like CAISO to clarify the historical days split window for the 150 sample days in sample scheme 4. The graphical representation on slide 11 looks like each portion of the sample is equal in size (e.g., 75 days from T-1yr and the 75 most recent days) but we would like to confirm this assumption.

Yes, that is correct

**6. Provide your organization's comments on if there are additional metrics you would like the CAISO to present when analyzing the overall performance of the mosaic methodology.**

None at this time.

NA

**7. Provide your organization's comments on whether this presentation met your expectations of the overall Imbalance Reserves Mosaic Parameter Requirements initiative? If no, please elaborate.**

Yes, PG&E commends CAISO's thorough and well-presented analysis. The stakeholder call and the opportunity to comment on this step meets our expectations for this and all future steps in the tuning and implementation process. CAISO has presented a strong enough case to move to the next step. PG&E expects to continue this collaborative effort through to the successful implementation of the imbalance reserves product and successful launch of EDAM.

NA

**8. Provide any additional comments.**