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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Oversee the Resource Adequacy Program, Consider Program Reforms and Refinements, and Establish Forward Resource Adequacy Procurement Obligations.	Rulemaking 21-10-002 (Filed October 7, 2021)

RESPONSE OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) TO CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S PETITION FOR MODIFICATION OF DECISION 22-03-034

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Dated: October 11, 2022

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II. INTRODUCTION

Pursuant to Rule 16.4(f) of the Rules of Practice and Procedure ("Rules") of the California Public Utilities Commission ("Commission"),[1] and Administrative Law Judge Debbie Chiv's Email Ruling,[2] Pacific Gas and Electric Company ("PG&E") respectfully submits this response to the Petition.[3] PG&E opposes the Petition for the reasons set forth below.

The Petition requests modifications to Decision ("D.") 22-03-034 that, if implemented, appear to effectively eliminate certain resource adequacy ("RA") procurement obligations for all Commission-jurisdictional load serving entities ("LSE"). Similar to past filings by the California Community Choice Association ("CalCCA"), the Petition also requests modifications to D.22-03-034 that would allow LSEs to seek waivers of penalties associated with any failure to meet their system and flexible RA procurement obligations for the 2023 RA compliance year.[4]

[1] All other references to Rules in this pleading are references to the Rules of Practice and Procedure of the Commission, unless otherwise noted.
[2] *Email Ruling Granting, with Modifications, CalCCA's Motion to Shorten Time*, dated October 4, 2022.
[3] The "Petition" is *California Community Choice Association's Emergency Petition for Modification of D.22-03-034 to Modify Resource Adequacy Procurement Timeline and Adopt Interim System Resource Adequacy Waiver Process*, dated September 30, 2022.
[4] *E.g.*, Rulemaking 17-09-020 - *California Community Choice Association Petition for Modification of Decision 19-06-026*, dated October 30, 2019. All such prior requests have been rejected.

In this response, PG&E explains that the Petition is procedurally deficient and should be denied. PG&E also clarifies that there is no reason that the relief requested in the Petition must be granted prior to October 31, 2022 and doing so would be procedurally impossible. Finally, PG&E expresses its substantive concerns about CalCCA's proposal and explains why it would be more appropriate to consider these issues in the next phase of the implementation track of this proceeding, not in a separate decision on the Petition. For these reasons, PG&E respectfully requests that the Commission deny the Petition and direct CalCCA to raise any related issues in the next phase of the implementation track of this proceeding.

III. PG&E'S RESPONSE

A. The Petition is Procedurally Deficient

Rule 16.4(b) requires a petitioner to concisely state the justification for the requested relief, including any factual allegations supporting proposed changes to a decision. Rule 16.4(b) further provides that any factual allegations "must be supported with specific citations to the record in the proceeding or to matters that may be officially noticed. Allegations of new or changed facts must be supported by an appropriate declaration or affidavit."[5] The Commission has previously dismissed a petition for modification that failed to comply with these requirements.[6]

The Petition fails to meet the procedural requirements under Rule 16.4(b) with respect to both the requests for (i) changes to a portion of LSEs' RA procurement obligations and (ii) adoption of a waiver-of-penalties process for system and flexible RA compliance failures. CalCCA appears to suggest that its requested changes related to LSEs' RA procurement obligations are justified due to challenges and uncertainty associated with central procurement entity ("CPE") local RA procurement deficiencies for the 2023 RA compliance year. CalCCA acknowledges, however, that the "Commission recognized the challenges a deficiency and CAISO backstop could present for 2023" in D.22-03-034 and gave LSEs in the PG&E service

[5] Rule 16.4(b).
[6] D.00-04-002 (ordering dismissal of a petition for modification without prejudice for failure to comply with the Rules related to support for factual allegations, among other things).

territory additional flexibility in meeting their year-ahead procurement obligations.[7] Specifically, D.22-03-034 directed Energy Division not to send deficiency notices to LSEs until after January 1, 2023,[8] effectively providing LSEs with additional time to meet their year-ahead system and flexible RA requirements. CalCCA's Petition presents no new, properly supported facts that could require modifications to the Commission's final decision. To the extent that CalCCA disagrees with the Commission's resolution of this issue in D.22-03-034, it should raise its concerns in the next phase of the implementation track of this proceeding where all parties will have the opportunity to make proposals regarding policy changes and present evidence supporting those proposals.

Likewise, CalCCA's proposal for a waiver-of-penalties process for system and flexible RA compliance failures has been rejected repeatedly in the past.[9] CalCCA recognizes this fact in the Petition,[10] but suggests that the Commission should change course now based on unsupported factual allegations about alleged shortfalls in system RA. CalCCA fails to explain, however, how its proposal addresses the "significant, unresolved issues" the Commission stated must be further considered before allowing such waivers, "including potential leaning by LSEs and market power issues."[11] An unsupported petition for modification that does not address critical issues identified by the Commission is not the proper procedural vehicle to make major changes to the RA program, especially changes that could compromise the reliability of California's electric system.

In short, CalCCA does not provide any declaration or affidavit in compliance with Rule 16.4(b) to support any alleged new facts that would warrant modifications to D.22-03-034, and it fails to properly justify its requested relief. Thus, the Petition is procedurally deficient with

[7] Petition, p. 6.
[8] D.22-03-034, Ordering Paragraph 14.
[9] D.19-06-026, p. 18; D.20-06-031, p. 63.
[10] Petition, p. 14.
[11] D.20-06-031, p. 65 (quoting D.19-06-026, p. 18).

respect to any factual allegations and the Commission should disregard any such factual allegations in making its findings, conclusions, and orders denying the Petition.

B. The Petition's Requested Relief Could Not Be Achieved, and is Unnecessary, Prior to the October 31, 2022, RA Compliance Deadline

In requesting a shortened seven day period to respond to the Petition,[12] CalCCA suggested that "time is of the essence in resolving the issues presented by the Petition" because LSEs must make their annual system RA compliance showings on October 31, 2022.[13] The Petition cites the "proximity of the RA compliance deadline" as a reason for "a swift response."[14] While not expressly stated, CalCCA's insistence on a shortened time period for responses and characterization of its motion as an "emergency"[15] suggests that CalCCA is expecting an urgent resolution of the Petition prior to the RA compliance deadline of October 31, 2022. CalCCA fails to explain, however, how early responses to the Petition would help achieve its goal, or why a decision is even necessary prior to October 31, 2022. In fact, early responses will not result in a final decision resolving the Petition prior to October 31, 2022, due to the comment requirements associated with proposed decisions under Rule 14.3.[16] Thus, as a procedural matter, it would be impossible for the Commission to issue a final decision on the Petition prior to October 31, 2022.

Moreover, the Commission already directed Energy Division staff not to send deficiency notices to LSEs serving load in PG&E's service territory until after January 1, 2023, in order to give LSEs additional flexibility in securing their year-ahead system and flexible RA portfolios.[17]

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[12] Absent Commission action to shorten response time, responses to the Petition would have been due on October 31, 2022. Rule 16.4(f).

[13] *California Community Choice Association's Motion to Shorten Response Time to Petition for Modification of D.22-03-034 to Modify Resource Adequacy Procurement Timeline and Adopt Interim System Resource Adequacy Waiver Process*, dated September 30, 2022, p. 2.

[14] Petition, p. 3.

[15] While CalCCA styles its Petition as an "emergency," it is not clear to PG&E why CalCCA waited to file it until September 30, 2022. Based on the Petition, it appears that the information underlying the requested modifications was known well in advance of that date, and an earlier filing could have been achieved. Had that been done, parties would not have been deprived of their typical response time.

[16] While Rule 14.6 allows for reduction or waiver of the public period for review and comment on proposed decisions under certain circumstances, such circumstances do not apply here.

[17] D.22-03-034, p. 35, Ordering Paragraph 14.

This effectively means that the October 31, 2022 deadline for procurement for such LSEs has already been extended, alleviating any concerns that Commission action before October 31, 2022, is necessary to prevent penalties from being incurred in the near-term. Despite CalCCA's suggestion in the Petition, a decision by October 31, 2022 (which is procedurally impossible) is simply not necessary to prevent any type of "emergency."[18]

Given the foregoing, CalCCA's request to shorten time to respond to the Petition is detrimental to the regulatory process without providing any benefit. Rule 16.4(f) provides a 30-day response period because that is the reasonable period of time for a response absent exigent circumstances (which do not exist here). The Petition addresses serious and complex issues that are not straightforward and require a thoughtful response. As noted herein, the requested modifications appear to effectively eliminate certain year-ahead and month-ahead RA procurement obligations for all LSEs. Such an outcome is concerning, risks system reliability, encourages leaning by LSEs, and could shift costs to LSEs that meet their RA procurement obligations. Requesting a shortened response time without any compelling reason is prejudicial to parties intending to respond fully to CalCCA's assertions and harmful to the Commission's regulatory process. The Commission should recognize that the Petition's requested relief is unnecessary and impossible prior to October 31, 2022, and the Petition should be denied.

C. PG&E Opposes CalCCA's Proposed Modifications to the RA Program

Below, PG&E provides a summary of its understanding of CalCCA's proposed modifications in the Petition and an explanation of its opposition to such modifications.

i. Summary of CalCCA's Proposal

The Petition proposes immediate and complex modifications to the RA program. First, CalCCA proposes that - beginning with the 2023 RA compliance year - all Commission-jurisdictional LSEs be allowed to seek waivers of penalties associated with any failure to meet

[18] As acknowledged by CalCCA, D.22-03-034 contemplated the conditions described in the Petition and provided a modified timeline for procurement by LSEs in PG&E's service territory. There are no extraordinary conditions described in CalCCA's Petition that could constitute an unforeseen emergency situation.

their year-ahead and month-ahead system and flexible RA procurement obligations.[19] CalCCA also suggests that this modification to the RA program would be an "interim" process but fails to propose any subsequent sunsetting date.[20]

Second, the Petition proposes "suspending" LSEs' RA requirements of their year-ahead and month-ahead system and flexible RA procurement obligations until certain specific dates and actions are taken by the California Independent System Operator Corporation ("CAISO").[21] CalCCA also proposes that this "suspension" to the RA program would only apply to LSEs serving load in PG&E's service territory and would apply to an amount equal to an LSE's monthly load-share of the CPE's monthly local RA deficiency until after the CAISO backstops the CPE's local RA deficiency.[22]

In summary, PG&E understands CalCCA's proposed "suspension" modifications for the PG&E service territory to effectively result in the following:

- LSEs would have until May 1, 2023, to meet their year-ahead and month-ahead RA requirements for the months of May through October 2023.
- LSEs would have until January 1, 2023, to meet their month-ahead RA requirements for the months of January through March 2023.
- The system RA requirements for the months of January through March 2023 will be set at approximately 700 to 950 MW lower than the monthly peak load forecast and significantly lower than what is required to meet the monthly peak load forecast <u>plus</u> operating reserves required by the Western Electricity Coordinating Council <u>plus</u> planning reserve contingencies.
    - Specifically, CalCCA's proposed "suspension" modifications would decrease the system RA requirements for the PG&E service territory:

[19] Petition, pp. ii, 14.
[20] *Id*., pp. ii, 2.
[21] *Id*., pp. ii, 11.
[22] *Id*., p. 11 ("If, for example, an LSE's system RA load share were five percent for September 2023, the Commission should suspend 128 MW (five percent of 2557.61) of the LSE's total requirement for that month." (citation omitted)).

    - From 15,188 MW to 12,379 MW for January 2023
        - Peak load forecast of 13,093 MW
    - From 14,585 MW to 11,628 MW for February 2023
        - Peak load forecast of 12,573 MW
    - From 13,286 MW to 10,560 MW for March 2023
        - Peak load forecast of 11,453 MW.
- The procurement responsibility of the "suspended" RA capacity will be explicitly transferred solely to the CAISO on a front-stop basis for the months of January, February, May, and June 2023.

ii. System RA Waivers Risk System Reliability

Providing waivers for system RA penalties compromises grid reliability by encouraging heavy reliance on short-term and backstop RA procurement practices that are inconsistent with the statutory objectives of the RA program.[23] A system RA penalty structure is a necessary component of the RA program because it provides an appropriate incentive for LSEs to develop RA portfolios ahead of time that are resilient to the type of market shortage conditions that California is currently experiencing. Without this incentive, there is no other tool available to the Commission to hold an LSE accountable for failing to support reliability and fulfill its responsibility to serve its load. Critically, when California experiences the need to institute rotating outages related to system reliability deficiencies, the outages impact all customers on a rotating basis, not just those customers of the LSE who opted not to engage in prudent portfolio planning. Because reliability impacts all customers, not just the customers of an LSE that fails to procure sufficient RA, it is imperative that the RA program maintain system RA penalties so that all LSEs are incentivized to engage in prudent portfolio management.

[23] Specifically, Section 380(b)(1) of the California Public Utilities Code states one of the RA program objectives is to "facilitate development of new generating, nongenerating, and hybrid capacity and retention of existing generating, nongenerating, and hybrid capacity that is economic and needed." Cal. Pub. Utils. Code § 380(b)(1).

This is particularly relevant in the current context given that the procurement practices undertaken by some of the LSEs represented by the petitioner may have contributed to the circumstances under which these same LSEs now seek relief. In the Track 3.B workshop in Rulemaking 19-11-009, held on November 18, 2020, Energy Division Staff presented clear evidence showing the decline in long-term contracting and an increase in RA-only deals, and also showed LSE contracting relative to load served for community choice aggregators ("CCAs"), electric service providers ("ESPs"), and investor-owned utilities ("IOUs").[24] At the time the data was compiled, and as shown by Energy Division staff's analysis, both CCAs and ESPs appeared under-contracted relative to load served for 2022 and beyond. The fact that a decline in long-term contracting may have contributed to the current situation should not come as a surprise, as noted in the presentation: "[T]he long-term contracting that is likely necessary for the stability of the energy market (and what helped to get CA out of the energy crisis) is rapidly disappearing, just as the system tightens, market fragmentation increases, and market power emerges."[25]

PG&E does not believe the Commission should provide system RA penalty waivers as requested by CalCCA because the precedent it sets could undermine the RA program going forward. Additionally, to the extent that the Commission considers such an option, it should be done through a more thorough stakeholder process, not an emergency petition for modification at the eleventh hour.

iii. The System RA Market for 2023 is Not Deficient

CalCCA's proposal for a system RA penalty waiver process is based on its own stack analysis – solely focused on the month of September 2023 – comparing RA resources relative to system RA requirements.[26] CalCCA's stack analysis concludes that there is a shortfall of 2,427

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[24] Track 3.B. Workshop: RA Structural Changes, slides 22-27, *available at*: https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc_public_website/content/utilities_and_industries/energy/energy_programs/electric_power_procurement_and_generation/procurement_and_ra/ra/track-3b-day-1-presentation.pdf.
[25] *Id.*, slide 22.
[26] Petition, pp. 13-14. As noted above, CalCCA does not provide any declaration or affidavit in compliance with Rule 16.4(b) to support its own stack analysis.

MW of net qualifying capacity ("NQC") to meet the monthly peak load forecast for the month of September 2023 with a newly adopted 16 percent planning reserve margin ("PRM").[27] While PG&E agrees that there is a tightening of the system RA market and several barriers have impacted new resources from coming online in time to meet the procurement orders adopted in D.19-11-016 and D.21-06-035 ("IRP Decisions"), PG&E disagrees with CalCCA's conclusion that there is a shortfall of 2,427 MW of NQC for the month of September 2023.

PG&E conducted a similar stack analysis for all months of the 2023 RA compliance year using similar assumptions as CalCCA. However, PG&E accounted for new resources expected to come online in accordance with the IRP Decisions, which CalCCA's stack analysis fails to do. PG&E's stack analysis shows that the system RA market for 2023 is not deficient, but instead, notably shows a surplus of 702 MW of NQC for the month of September 2023.

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[27] *Id*., p. 13.

PG&E's Stack Analysis for the 2023 RA Compliance Year

Month	Total RA Requirements[28]	CAISO Resources[29],[30],[31]	New Resources[32]	Excess / (Shortfall)
January	36,066	51,336	-	15,269
February	34,764	51,702	-	16,938
March	33,747	51,528	-	17,780
April	37,231	52,194	-	14,963
May	41,915	52,874	-	10,959
June	48,786	54,089	-	5,304
July	52,661	54,714	-	2,053
August	53,269	54,032	1,695	2,458
September	54,310	53,317	1,695	702
October	44,081	51,751	1,695	9,365
November	36,423	51,522	1,695	16,794
December	37,864	51,525	1,695	15,356

While it may be reasonable to adopt a conservative assumption that none of the procurement orders from the IRP Decisions will materialize for 2023 (e.g., 1,695 MW will not

[28] *See* the Commission's RA 2023 Forecast Summary Tables, *available at*: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/resource-adequacy-homepage/resource-adequacy-compliance-materials/ra-2023-forecast-summary-tables.xlsx.
[29] *See* the CAISO's Final NQC Report for Compliance Year 2023, *available at*: http://www.caiso.com/Documents/Final-Net-Qualifying-Capacity-Report-For-Compliance-Year-2023.xls.
[30] *See* the Commission's 2023-2025 Demand Response Totals for each individual IOU, *available at*: https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/resource-adequacy-homepage/resource-adequacy-compliance-materials.
[31] Using similar assumptions as CalCCA, PG&E applied an import RA amount of 5,990 MW across all months of the year. *See* CAISO, 2022 Summer Loads and Resources Assessment, p. 15, *available at*: http://www.caiso.com/Documents/2022-Summer-Loads-and-Resources-Assessment.pdf.
[32] The IRP Decisions ordered the collective procurement of 2,825 MW of new resources to come online by August 1, 2023. Assuming a "delay/failure rate" of 40 percent based on analysis by the CEC, PG&E assumes only 1,695 MW will come online by August 1, 2023 (2,825 MW * 60 percent = 1,695 MW). *See* CEC/CAISO, Transitioning to a Clean Energy Future: Electric Reliability Outlook, slide 11, *available at*: https://efiling.energy.ca.gov/GetDocument.aspx?tn=244871.

come online), an updated stack analysis assuming this would only show a 993 MW shortfall for the month of September 2023 (702 MW minus 1,695 MW). Meeting this "shortfall" would not take the "heroic amount of incremental import RA"[33] that CalCCA asserts. In fact, this would only take an import RA amount of approximately 6,983 MW (5,990 MW plus 993 MW) for the month of September 2023. Importantly, an import RA amount of 6,974 MW was procured for the month of September 2020 by Commission-jurisdictional LSEs.[34]

PG&E also highlights that the California Energy Commission ("CEC") recently performed an hourly stack analysis for the summer months of July to September 2023. The CEC's hourly stack analysis produced similar conclusions as PG&E's stack analysis. That is, because of significant planned new resources anticipated to come online, the system has sufficient resources available to meet the peak load forecast, including September 2023, with a 16 percent PRM.[35] Thus, the system RA market for 2023 is not deficient as CalCCA asserts. At a minimum, the Commission should ensure it and stakeholders have adequate time to vet the CalCCA analysis prior to taking actions as drastic as those requested by CalCCA.

iv. "Suspending" LSEs' RA Requirements and Changing the Procurement and Compliance Timelines are Unwarranted

CalCCA effectively proposes that the CAISO backstop process function as a front-stop mechanism for LSEs that have chosen to bypass their procurement responsibility for financial reasons and have subsequently failed to procure sufficient capacity to meet their year-ahead and month-ahead system and flexible RA requirements.[36] As detailed above, CalCCA's proposed "suspension" modifications for the PG&E service territory effectively results in two things.

First, the proposed modifications would set the RA requirements for the months of January through March 2023 at approximately 700 to 950 MW lower than the monthly peak load

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[33] Petition, p. 14.
[34] Commission Energy Division, 2020 Resource Adequacy Report, December 2021, p. 15, *available at*: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/resource-adequacy-homepage/2020_ra_report.pdf.
[35] *See* CEC Staff Paper, Summer Stack Analysis for 2022-2026, July 20222, p. 16, *available at*: https://efiling.energy.ca.gov/GetDocument.aspx?tn=244116&DocumentContentId=78009.
[36] *See* Petition, pp. ii, 2, 9-10.

forecast and significantly lower than what is required to meet the monthly peak load forecast plus the 16 percent PRM, thereby compromising the ability of California to meet its energy needs in these months.[37]

Second, CalCCA's proposed modifications to the procurement and compliance timelines make it impossible for LSEs to serve as the front-stop procurement entities for certain months, thereby guaranteeing the explicit transfer of sole procurement responsibility of the "suspended" RA capacity to the CAISO for the months of January, February, May, and June 2023. This is because CalCCA proposes that: (1) LSEs would have until May 1, 2023, to meet their year-ahead and month-ahead RA requirements for the months of May through October 2023 and (2) LSEs would have until January 1, 2023, to meet their month-ahead RA requirements for the months of January through March 2023. In other words, CalCCA's proposed procurement and compliance timelines for LSEs to demonstrate that sufficient capacity has been procured occur days after, and in some cases months after, CAISO is expected to exercise its procurement authority for backstop procurement.

In CalCCA's request for a modification to the procurement and compliance timelines and penalty waivers, CalCCA notes that their proposed changes would "…give the CAISO ample time to engage in any additional system RA…" procurement "…before the pivotal summer months."[38] These changes effectively designate CAISO as the front-stop procurement entity, a material structural change to the RA program that deserves significantly more stakeholder input and sufficient time for thoughtful consideration by the Commission.

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[37] CAISO has issued restricted maintenance operations in the winters of 2018, 2020, and 2021, which highlights that procuring sufficient resources to meet peak load forecasts for all months of the year are critical for system reliability needs. *See* CAISO, Grid Emergencies History Report, pp. 44-47, 67, 100-101, and 105-106, *available at*: http://www.caiso.com/Documents/Grid-Emergencies-History-Report-1998-Present.pdf.

[38] Petition, p. 12.

v. There are Many Uncertainties in the RA Program, and It Was Reasonable to Assume CPE Allocations Would be Lower Than the Full PG&E Local RA Requirement

CPE uncertainty is just one source of uncertainty that LSEs must manage as part of the RA program. There are other regulatory and market uncertainties, such as updates to RA counting rules, RA substitution needs due to planned or unplanned maintenance outages, changes to an LSE's load forecast, or delays in resources' online dates, that impact RA procurement obligations. Uncertainty itself, however, does not warrant system RA penalty waivers or additional changes to the procurement and compliance timelines. This issue was already discussed as part of this proceeding and a reasonable solution was already provided for in D.22-03-034. D.22-03-034 adopted a balanced procurement timeline for both the CPE and LSEs to address "the need for LSEs to have sufficient time to incorporate the CPE's procurement actions into their system and flexible RA portfolio planning"[39] and defers the deficiency assessment date until at least January 1, 2023, allowing two additional months for LSEs to contract for system and flexible RA requirements.[40]

Reasonable portfolio managers should have expected CPE allocations lower than the full PG&E local RA requirement for at least two reasons. First, in some local areas, there is little to no surplus RA. Relevantly, PG&E's service territory contains severely constrained local areas. In fact, the CAISO's 2023 Local Capacity Technical Study Report shows that, in the PG&E service territory, both the Stockton and Kern local capacity areas have less available capacity than is required in each of those respective local areas. Further, the Humboldt, North Coast / North Bay, and the Greater Bay Area local capacity areas each have little available capacity beyond their respective requirements. The Greater Bay Area margin is particularly significant given that it comprises the bulk of the total local RA requirement in the PG&E service territory.

Second, the CPE hybrid framework incorporates a "self-showing option" and does not require participation by LSEs and/or generators in the CPE solicitation process. As CalCCA

[39] D.22-03-034, p. 33.
[40] *Id*., p. 35, Ordering Paragraph 14.

points out, generators may not participate in the CPE solicitation, as they may believe that they can get a better price through the bilateral RA market than they can through the CPE solicitation process.[41] Notably these generators may have already sold capacity to LSEs as "unspecified" product, meaning that the RA capacity that CalCCA seeks to have CAISO procure via its Capacity Procurement Mechanism process may not even be available for procurement. Given scarcity in the system RA market, it is reasonable to believe that this could be the case; however, this should not be an excuse for further and abrupt changes to the procurement and compliance timelines at this time. As previously stated, CalCCA should raise its concerns on these issues, including these market dynamics, in the next phase of the implementation track of this proceeding.

IV. CONCLUSION

PG&E appreciates the opportunity to provide this response to the Petition. As described in detail above, the Petition should be denied and CalCCA should be directed to raise any related issues in the next phase of the implementation track of this proceeding.

Respectfully submitted,

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[41] Petition, pp. 7-8.