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PG&E Comments on 2023 Summer Reliability Workshop

Additional submitted attachment is included below.

Pacific Gas and Electric Company

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California Energy Commission
Docket Unit, MS-4
Re: Docket No. 21-ESR-01
715 P Street
Sacramento, California 95814

Re: Pacific Gas and Electric Company's Comments on the Summer 2023 Reliability Workshop

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to submit these comments on the May 17, 2023, Summer 2023 Reliability Workshop hosted by the California Energy Commission (CEC) and with participation from the California Public Utilities Commission (CPUC), the California Independent System Operator (CAISO), Go-Biz, and other stakeholders.

The workshop provided a helpful overview of information from different stakeholders such as the State Water Project and the California Department of Forestry and Fire Protection on the grid reliability outlook for the summer of 2023 as well as industry presentations on how new resource supply chain constraints may need to play a role in future reliability assessments.

In particular, PG&E appreciates that the workshop highlighted supply chain issues as an important consideration for grid reliability, with a focus on the solar and storage industries. The presentations highlighted various issues impacting project viability and development timelines for this summer, and future procurements ordered by the CPUC in the Integrated Resource Planning (IRP) proceeding. These issues include trade cases, tariffs, forced labor, commodity prices, domestic manufacturing capability, and interconnection delays. PG&E has seen market evidence of these issues impacting project development timelines to fulfill IRP procurement orders. These supply chain issues are a real constraint and concern, and PG&E recommends that the CPUC, CAISO and CEC look holistically at project development delays and interconnection limitations and the impacts these challenges have on timeframes for new resource development completion. Further, PG&E recommends that the CPUC, CAISO and CEC coordinate and collaborate to capture these project development constraints, including expectations on the extent and longevity of these challenges, to ensure that these constraints are reflected in the modeling and decision-making processes across the CPUC, CAISO and CEC. The agencies should also include assumptions about the project development constraints in online date requirements to reflect market conditions more closely, as well as including these assumptions in their consideration of the grid reliability outlook for the next decade.

PG&E commends the collective effort of all the state agencies for working to reconcile resource baseline differences. In future reliability assessments, PG&E encourages the CEC, CPUC, and CAISO to continue providing greater transparency in regard to analytical inputs and assumption comparisons, including the project development constraints identified earlier. During the workshop the agencies noted a better understanding of input and assumption differences due to better information sharing practices. However, it would be helpful to disclose the comparison of such analytical differences so that stakeholders can also provide more meaningful feedback. Additionally, the hydroelectric modeling methodology will continue to be a critical component in future reliability assessments, especially given how volatile hydroelectric conditions have been in recent years. For example, the CPUC has recently moved to a "detrended" hydroelectric availability methodology which is decoupled from modeled weather years.[1] Benchmarking each agency's hydroelectric modeling methodology would be insightful for future reliability assessments.

Thank you for the opportunity to provide feedback on the workshop and please let me know if you have any questions about our comments and recommendations.

Sincerely,

/s/

Mark Krausse

[1] https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/integrated-resource-plan-and-long-term-procurement-plan-irp-ltpp/20230210_irp_e3_astrape_updated_incremental_elcc_study.pdf