

PG&E Comments: Exceptional Dispatch

- What is the meaning/purpose of an exceptional dispatch instruction to hold state of charge in a given hour:
 - End of hour SOC? (Possibility of AS and even RT energy)
 - Maintain constant SOC throughout hour? (No AS capability)
 - End of hour minimum/maximum SOC? (Allowing charge or discharge depending on range)
- If counterfactual compensation applies to ED for SOC, should it apply to all ED not currently compensated (e.g., out of market curtailments or decommitments)?

PG&E Comments: Regulation Restrictions

- Requirement of unencumbered energy bids reduces potential regulation value by half
- Edge case could also be avoided by increasing required half hour SOC buffer (upward/downward) to a higher value. A one hour buffer would for example be sufficient to avoid infeasibility altogether
- Another problem with unencumbered energy bids is that it requires energy to be bid in periods when batteries may not want to offer charge/discharge due to schedules in other hours or other opportunity costs: unencumbered bids can always be taken in the market independent of use to support regulation