

## PRR 1122: Inappropriate Reporting of Forced Outages



### Comments of Pacific Gas and Electric Company

#### PRR 1122 – Comments on CAISO Recommendation to Approve PRR as Submitted

| Submitted by           | Company                  | Date Submitted |
|------------------------|--------------------------|----------------|
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Pacific Gas and Electric Company (PG&E) offers the following comments on the California Independent System Operator’s (CAISO) recommendation to approve PRR 1122 as submitted.

PG&E appreciates the opportunity to comment on this PRR as it raises several important issues relating to outage management and Resource Adequacy (RA). PG&E’s comments can be summarized as follows:

- PG&E does not agree with the recommendation to approve as submitted.<sup>1</sup>
- The CAISO should strike a redundant and overly broad sentence<sup>2</sup> from the PRR.<sup>3</sup>
- The CAISO should address outage management process improvements.
- PG&E would support the PRR with the suggested sentence removed.

Each of these points is addressed in more detail below.

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<sup>1</sup> CAISO’s recommendation posted here:

<https://bpmcm.caiso.com/Pages/ViewPRR.aspx?PRRID=1122&IsDlg=0>

<sup>2</sup> “Resubmitting the outage could be viewed as submission of false information to the ISO and/or taking an outage not authorized by the ISO”

<sup>3</sup> <https://bpmcm.caiso.com/Lists/PRR%20Details/Attachments/1122/ISO%20revised%20PRR%201122.docx>

## PRR 1122: Inappropriate Reporting of Forced Outages

### 1. **PG&E does not agree with the recommendation to approve as submitted**

In the PRR, the CAISO provides notice to market participants that inappropriate reporting of forced outages is being monitored by the CAISO and that current policy is to report such behavior to FERC. The CAISO has also stated that this PRR is not changing current policy but merely informing participants.<sup>4</sup>

PG&E and other stakeholders<sup>5</sup> have repeatedly raised concerns with the language in this PRR and PRR 1074<sup>6</sup> that shared the same language. In fact, no stakeholder has written to support either of these PRRs. While PG&E recognizes and appreciates that the CAISO has made edits in response to stakeholder concerns, these edits have not been sufficient to change PG&E's position that this PRR should not be approved.

### 2. **The CAISO needs to strike a redundant and overly broad sentence from the PRR**

PG&E's key concern with the PRR as written is the following sentence:

*“Resubmitting the outage could be viewed as submission of false information to the ISO and/or taking an outage not authorized by the ISO.”*

This is overly broad and could be misinterpreted to apply to appropriate resubmissions of canceled planned outages. In addition, the sentence does not detail or imply any further investigation or dialog to determine if suspected inappropriate behavior is, in fact, inappropriate. Finally, the sentence is redundant given the PRR's final sentence:

*“Where the CAISO determines that a PTO or scheduling coordinator for a generator may have reported outages inappropriately, the CAISO and/or the Department of Market Monitoring may investigate and inform FERC of such conduct”*

The final sentence is much more specific to the inappropriate behavior; clearer that further investigation and dialog will take place to determine whether or not the outage was appropriate; and provides the same notice regarding potential FERC action to participants.

There is no need for the first sentence and CAISO should strike it from the PRR.

### 3. **The CAISO needs to act today to improve the outage management process**

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<sup>4</sup> Based on CAISO verbal comment in 2/26/19 webinar

<sup>5</sup> Six Cities, SCE, NCPA, and PG&E

<sup>6</sup> <https://bpmcm.caiso.com/Pages/ViewPRR.aspx?PRRID=1074&IsDlg=0>

## PRR 1122: Inappropriate Reporting of Forced Outages

In the PRR 1122, and prior PRR 1074, stakeholders have provided many examples of outage cancellations that could have been avoided or mitigated. An obvious example of this is the cancellation of a planned outage for a solar facility at night. The fact that such an outage is being cancelled shows that the process is overly automated, and relies primarily on rules rather than reason.

In response to this example, and others, the CAISO verbally expressed to PG&E that it would make “non-Tariff, non-BPM improvements” to the process.<sup>7</sup> To date, the CAISO has not provided its list of process improvements. Before approval of this PRR, PG&E requests additional information on these improvements.

PG&E recognizes that the CAISO has suggested that these issues should be addressed in the RA Enhancements stakeholder initiative. However, these issues are having real effects today through artificially tightened RA and energy markets due to outage management and substitution processes that, at times, can result in unreasonable cancellations. These issues need to be addressed today rather than at some future point in another stakeholder process.

### 4. PG&E could support the PRR with the suggested sentence removed.

PG&E could support PRR 1122 with the suggested sentence removed. The resulting BPM language would be as follows:

*“If the CAISO initially approves a requested planned transmission or generation outage and the CAISO subsequently disapproves the outage or withholds final approval, it is generally not appropriate for the PTO or scheduling coordinator for the generator to resubmit the same (or substantially similar) outage as a forced outage. ~~Resubmitting the outage could be viewed as submission of false information to the ISO and/or taking an outage not authorized by the ISO.~~ The CAISO cannot identify prospectively all instances in which resubmission in the forced timeframe may be appropriate. Examples of instances where resubmission in the forced timeframe may be appropriate include where: the planned outage was submitted because the need for addressing an imminent maintenance issue was identified shortly before the planned timeframe elapsed; the physical circumstances surrounding the outage request changed between the planned and forced timeframes (e.g., equipment has failed in service or is now in danger of imminent failure); or when waiting until the next opportunity for a planned outage poses substantial operational risk to the transmission or generation equipment.*

*“Additionally, it is generally not appropriate for a PTO or scheduling coordinator for a generator to submit a forced outage for planned, non-urgent maintenance as it interferes with the CAISO’s ability to*

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<sup>7</sup> This was verbally conveyed from CAISO to PG&E as a part of the PRR 1074 Appeals Process on 11/20/18.

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*concurrently manage outages, could create reliability risks and interferes with the intended functioning of availability incentives (e.g., RAAIM.)*

*“Where the CAISO determines that a PTO or scheduling coordinator for a generator may have reported outages inappropriately, the CAISO and/or the Department of Market Monitoring may investigate and inform FERC of such conduct.”*