DC Energy Comments: PRR 1217 Clarification of congestion revenue rights processes 2019

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DC Energy remains concerned about the current end-around that exists to the 30-day Rule pertaining to outage submissions as codified in sections 36.4.3.2 CRR Transmission Maintenance Outage and 36.4.3 Outages that may Affect CRR Revenue; Scheduling Requirements of the CAISO’s Tariff. Tariff section 36.4.3.2 defines which outages are captured in the 30-day Rule and in part reads:

***36.4.3.2 CRR Transmission Maintenance Outage****CRR Transmission Maintenance Outages are those Outages that may have a significant effect upon CRR revenue adequacy, which are defined as outages that affect transmission facilities on the CAISO Controlled Grid that:*

1. *(a)  are rated above 200 kV; or*
2. *(b)  are part of any defined flow limit as described in a CAISO Operating Procedure; or*
3. *(c)  were out of service in the last three (3) years and for which the CAISO determined a special flow limit was needed for real-time operation.*

*CRR Transmission Maintenance Outages consist only of outages that: (1) meet the criteria specified above; (2) involve system configuration changes that affect power flow in the CRR DC FNM; and****(3) cannot be initiated and completed within a twenty-four (24) hour period.*** *(emphasis added)*

The language in the Proposed Revision Request 1217 for the CRR Business Practice Manual falls short of what is needed to eliminate the practice where outages are broken up into a series of smaller outages less than 24-hours in order to avoid falling under the 30-day Rule. Specifically, the PRR’s revisions do not require a series of outages on the same element that span a period of greater than 24 hours to be submitted under the 30-day Rule, but instead merely “request” that they are.[[1]](#footnote-1) This has the potential to degrade the CRR monthly auction models and to increase CRR shortfall. Both of which are preventable with changes that would enforce the spirit of the 30-day Rule by replacing the “request” with a “requirement”. DC Energy encourages the CAISO to take additional measures to correct this issue, even if it is necessary to revise the Tariff. Through the years, DC Energy has been advocating for this practice to stop and indeed we see evidence that it is an ongoing issue. We respectfully submit the CAISO should do more to correct this problem.

1. 10.3.1 Monthly Outage Methodology for outages that may have a significant effect on CRR Revenue Adequacy: " If a transmission operator plans to take a series of outages that affect the same transmission element and in total exceed 24 hours but that individually are less than 24 hours, then the CAISO requests that the transmission operator report that series of outages at least 30 days before the start of the month." [↑](#footnote-ref-1)