

## California Energy Storage Alliance (CESA) Comments on CAISO PRR 1634

CESA is concerned that the proposed changes to the definition of the Plant Trouble nature of work go far beyond a simple clarification and fundamentally change how and in what instances resource operators may now be required to use this field. The reason provided is that it will “help scheduling coordinators to pick the correct nature of work in their outage submission” but there is no indication that scheduling coordinators are currently picking an incorrect nature of work nor was there a public process to determine that this new definition is appropriate and correct. Furthermore, the reasoning CAISO provides for its change to the definition does not provide sufficient justification for a change that may have broader implications than CAISO’s immediate intent. CESA requests CAISO provide a more detailed background and justification for the change so that stakeholders can appropriately review the change.

CAISO submitted a Proposed Revision Request (PRR) to update its Outage Management Business Practice Manual (BPM) on June 30, 2025. The PRR re-defines the “Plant Trouble” nature of work as **follows**:

- Plant equipment fails or is in danger of imminent failure resulting in a curtailment of dispatchable capacity. **This category also covers curtailments of dispatchable capacity caused by plant equipment or plant configuration element(s) whose purpose is to mitigate risk of harm to the plant and/or interconnected transmission equipment.**

The current Plant Trouble definition is focused on facility equipment failures. This means that the field applies when equipment at the facility is either operating or in danger of imminently operating inconsistent with its design criteria. Resource operators use the field to reflect when true equipment *failures* either derate or remove a facility from service.

CESA is concerned that the new language, not limited to instances of immediate or imminent equipment failure, could be interpreted to expand the definition to include instances where facility equipment is operating within its design criteria or instances when the transmission or distribution system equipment (not at the control of the resource operator) limits resource operation. Furthermore, CESA is concerned that the new definition may inadvertently capture normal operations scenarios for energy storage

resources (such as dispatch nonlinearities). In other forums,<sup>1</sup> CAISO is actively discussing resource model changes to ensure that the market optimization accurately represents normal resource operating criteria, recognizing that these instances ideally should not require resource operators to submit outages.<sup>2</sup> If the Plant Trouble nature of work is applied inappropriately, due to an overly broad definition, its use may mask root issues at the transmission and distribution level that should be discussed in a public stakeholder process to explore all policy interactions.

CESA recommends CAISO provide a more detailed background and justification for the proposed change so that stakeholders can appropriately review and provide relevant comments on the change.

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<sup>1</sup> CAISO Storage and Modeling Initiative, Issue Paper & Straw Proposal on Outage Management, Nonlinearity, and SOC Clarification, March 27, 2025

<sup>2</sup> Stakeholder comments on the March 27, 2025 Issue Paper & Straw Proposal indicate strong support for nonlinearities being RAAIM exempt until CAISO can implement fixes to its resource models.