CESA CALIFORNIA ENERGY STORAGE ALLIANCE

August 12, 2025

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

CESA is concerned that the proposed definition of the "Plant Trouble" nature of work is inconsistent with CAISO's own explanations provided in response to prior comments. In its PRR responses, CAISO stated that plant trouble should apply to equipment failures or protective actions taken to prevent plant equipment failure, and that any limitations caused by transmission components should be logged under the "Transmission Induced" category. However, the proposed definition still includes curtailments taken to protect interconnected transmission equipment—contradicting CAISO's stated intent and creating the risk that outages will be misclassified. As CAISO stated at the last BPM Change Management meeting, Scheduling Coordinators (SC) can seek individualized clarifications on the usage of nature of work fields directly from CAISO. The current definition will cause some SCs to seek clarifications on whether an outage should be Plant Trouble or Transmission Induced and would therefore cause inconsistent usage across all SCs. To ensure accurate and consistent outage reporting, the definition must be revised to remove references to transmission equipment and clearly limit "Plant Trouble" to issues related to facility equipment.

CAISO provided two responses to CESA's prior concerns within the text of the PRR but has not updated the proposed definition accordingly. First, CAISO stated:

> *"The intent of the language is to cover generation derate due to plant control setup (for example, limitation on co-located solar/battery output). The correct nature of work should be Plant Trouble. There is no impact on the current transmission induced NoW. Any transmission component caused limitation is under the Transmission Induced NoW."*

Second, CAISO stated:

> *"This BPM clarification outlines the ISO's current approach to reporting outages. The Plant Trouble category addresses reductions in dispatchable capacity due to imminent equipment failure. In some instances, protective equipment designed to prevent unit failure may reduce dispatchable capacity. This reduction is linked to plant failure as it is necessary to prevent a larger unit failure. This BPM revision does not replace the broader discussions on modeling and optimization issues for storage resources. For the topics that are currently discussed in the policy stakeholder process, it will continue to be discussed through that process. For any*

transmission component caused generation limitations, the transmission induced NoW should be used and there is no impact by this PRR."

CESA appreciates these further clarifications but is still concerned that the proposed Plant Trouble definition continues to reference curtailments to protect transmission equipment in light of CAISO's statements. 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.

Considering CAISO's statements, the definition must be further modified to remove reference to interconnected transmission equipment, as such outages should clearly be logged as Transmission Induced. CESA recommends the following modification to the proposed definition:

- 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~~.

Furthermore, CAISO should clarify that the intent of the Plant Trouble nature of work remains 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.