

# PRR1114 - Outage coordination changes due to reliability coordinator service - Stakeholder Comments

Submitted by	Company	Date Submitted
Aditya Chauhan aditya.chauhan@sce.com	Southern California Edison	12/20/18

Southern California Edison (SCE) offers the following comments on the California Independent System Operator (CAISO) PRR1114<sup>1</sup>.

The main issues with this PRR are: (a) an unwarranted commingling of Reliability Coordinator and Grid Operator duties, (b) drastic changes, especially deletions, in the language, coupled with the lack of any replacements or alternatives to deletions, and (c) a lack of clarity in the proposed language. This approach, without a clear examination of impacts, concerns SCE.

As SCE understands, the CAISO's role of Reliability Coordinator should still have a business-as-usual approach for the Grid Operator. Thus, there should be no reason for any changes to a Grid Operator document. Any changes should be within the Reliability Coordinator documents. Further, references to Reliability Coordinator documentation are not appropriate. The Grid Operator should address market and resource related outages independently from reliability related outages. The CAISO's role as a Reliability Coordinator has a different mandate from the CAISO's role as a Grid Operator. Finally, cross-referencing between the two roles can create conflict and lack of clarity, as is occurring within this PRR.

## **The CAISO should not unduly commingle Reliability Coordinator (RC) and Grid Operator tasks**

The CAISO has deleted section 3.5 (and added new material in section 2.4) and referred to the RC Operating procedure. It is not prudent to assume a permanent RC role for the CAISO and

---

<sup>1</sup> <https://bpmcm.caiso.com/Pages/ViewPRR.aspx?PRRID=1114&IsDlg=0>

manage the two separate entity's procedures as one. Maintaining independence of these roles is a responsible approach and the CAISO should not discard carefully laid out procedures and documentation of a grid operator. Thus, SCE opposes the deletion of section 3.5 that has the Grid Operator maintain automatic mapping of outages to the RC outage types.

Another case of commingling is on page 48. There is no clarity on what the OPA lockdown time is. Further, such information may better belong in the RC BPM.

### **The CAISO should not make drastic changes to the language without a comprehensive examination of the implications**

Another example of a serious impact of making changes without a comprehensive examination of the issues is the CAISO's proposed deletion of OE Recommended Outage State on page 19. No alternative to OE Recommended is offered which can result in the inability of market participants to understand the processing of these outage states. Further, the CAISO has removed the entire Outage State Transition flowchart, with no replacement.

Another instance of deletion, with no replacement, is on page 49.

### **The CAISO should provide more clarity on the boundaries of the various ranges of the outage planning windows**

In section 2.4, the proposed ranges (page 13) have wide margins on the boundaries of the planning windows and no specificity. Boundaries such as 90-120 days for long range, 45-75 days for mid range, and 12-19 days for short range do not provide any specificity – further, the boundaries have gaps in between, leaving unaddressed time ranges. Thus, this information is not useful to market participants. On pages 14 and 15, the CAISO requires notifications from market participants without specifying a timeline.

Further, the Long Range Planning Process is declared optional, on page 32, section 5.1. The CAISO needs to clarify: (a) who is awarded this optionality (SCs or TOPs), (b) if a submission is not made in the Long Range Process, does the submission get processed in the Mid-Range or the Short-Range?, and (c) clarify if the October 15<sup>th</sup> deadline is no longer a requirement.

Such optionality is also seen on page 39, with the Mid-Range being stated as an optional process. Hence, will this result in all studies migrating to the Short-Range window? What specifically is that Short-Range window? Finally, SCE notes that the Mid-Range window seems

to be aligned with the RA submittal timeline. Is there a general intent of the CAISO to conform all outages around a resource based process?

Reiterating, SCE questions the necessity of these changes, as their proposal shows undue commingling of RC duties as well as a lack of clarity and a lack of examination of the implications.

**The CAISO should remove the unnecessary ambiguity in the Short Range Planning section 2.4, page 15**

Subsection d reads:

“Outages that do not meet the Short-Range submission deadline are classified as:

- v. ISO Planned if submitted more than 8 days in advance of the outage start day and approved by the ISO. **Such an outage, however, is unlikely to receive Reliability Coordinator approval in time to proceed as planned.**
- vi. ISO Forced if submitted 8 days or less in advance of the outage start day.”

SCE understands that this is not a newly proposed change, apart from the renumbering. However, the sentence, “Such an outage, however, is unlikely to receive Reliability Coordinator approval in time to proceed as planned.” does not contribute anything substantive, and in fact, is confusing and problematic. First, the sentence does not offer any useful information on the certainty of approval other than stating, subjectively, that the certainty is low. Second, why is the approval unlikely if the information is submitted well in advance? Is the CAISO stating that if a SC better informs the CAISO then their outage is less likely to be approved? Third, why would the outage not be approved, given that the CAISO is now the RC and should be able to comprehensively process information? Fourth, by having the sentence included, the CAISO is demonstrating an inappropriate preference for forced outages.

For all these reasons, the CAISO should delete that sentence from the BPM.

**The language in section 3.1, page 18, is vague and unhelpful**

The CAISO should clearly define the timelines for forced versus planned outages. The text in this section is more suited for definitions in the appendix and does not add clarity to the BPM.

### **The CAISO should provide more clarity in section 3.5, page 24 onwards**

SCE is aware of several RC procedures listed on the CAISO's site<sup>2</sup>. The CAISO needs to specifically identify which RC operating procedure it refers to in section 3.5. Further, SCE notes that these documents will not be effective until July 1, 2019 – how does the CAISO propose to address this issue?

### **Text in section 6, page 39, needs editing**

In the second paragraph, the section reads, “For the example below...”.

The CAISO should delete this sentence as there is no example included.

### **SCE recommends an edit**

SCE suggests including the RC BPM as a potential source of the RC's outage coordination info, on page 42. Hence, the second bullet under “For unplanned Short-Range outages” should read: “...as specified in the Reliability Coordinator's outage coordination procedure **or BPM**”.

---

<sup>2</sup> <http://www.aiso.com/rules/Pages/OperatingProcedures/Default.aspx>