

# PRR 1122 - Stakeholder Comments

Submitted by	Company	Date Submitted
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Southern California Edison (SCE) offers the following comments on the California Independent System Operator (CAISO) Proposed Revision Request 1122<sup>1</sup>.

## **SCE does not see any material difference between the proposed language of PRR 1122 and PRR 1074**

SCE presents, below, a tracked change comparison of the proposed language in PRR 1074<sup>2</sup> as the base language with the proposed language in PRR 1122<sup>3</sup> as the incremental change.

~~If the CAISO initially approves a maintenance requested planned transmission or generation outage on a RA resource is approved and the ISO then asks for substitute capacity CAISO subsequently disapproves the outage or withholds final approval, it is generally not appropriate for the PTO or scheduling coordinator to cancel for the planned outage and generator to resubmit the same (or substantially similar) outage in the a forced timeframe. In the absence of changes in the physical circumstances surrounding the outage request between the planned and forced timeframes, resubmitting. Resubmitting the outage could be viewed as submission of false information to the ISO and/or taking an outage not authorized by the ISO. Instead, Resubmission in the scheduling coordinator should leave forced timeframe may be appropriate where the requested physical circumstances surrounding the outage as a request changed between the planned maintenance and forced timeframes or where further delay to the outage. If the scheduling coordinator does not provide the requested substitute capacity, either the ISO will cancel. poses imminent operational risk to the planned outage or the outage may proceed subject to potential RAIM non-availability charges. transmission or generation equipment. Similarly, it is not appropriate outage practice for a PTO or scheduling coordinator for a generator intentionally to refrain from submitting a planned outage until the force forced outage~~

<sup>1</sup> <https://bpmcm.caiso.com/Pages/ViewPRR.aspx?PRRID=1122&IsDlg=0>

<sup>2</sup> Section 9.2.1, Page 106.

<https://bpmcm.caiso.com/Lists/PRR%20Details/Attachments/1074/BPM%20for%20Reliability%20Requirements%20Version%2037.docx>

<sup>3</sup> Section 4.5, Page 29.

[https://bpmcm.caiso.com/Lists/PRR%20Details/Attachments/1122/Outage%20Management%20BPM%20Version%2017\\_redline.docx](https://bpmcm.caiso.com/Lists/PRR%20Details/Attachments/1122/Outage%20Management%20BPM%20Version%2017_redline.docx)

timeframe. This is particularly so with RA resources, considering that some forced outage nature of work categories are exempt from 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.

SCE does not see any material difference between the two. The proposed PRR 1122 language lacks clarity as did the proposed PRR1074 language. SCE reiterates its concerns in its appeal on PRR 1074<sup>4</sup> and does not support the proposed language in PRR 1122.

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<sup>4</sup> <https://bpmcm.caiso.com/Lists/PRR%20Appeals/Attachments/15/SCE%20Appeal%20on%20PRR%201074.pdf>