



PRR 1122: Inappropriate Reporting of Forced Outages

Submitted by	Company	Date Submitted
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While PG&E appreciates the CAISO’s efforts to revert PRR 1074 (*via* PRR 1121), PRR 1122 does not appear to be materially different than PRR 1074. The issues raised by PG&E, and other stakeholders, have not been adequately addressed.

PG&E requests CAISO improve PRR 1122 to be more aligned with the Tariff; more precisely focused on behavior that ought to be discouraged. Additionally, the CAISO should improve the outage management process to reduce situations where Scheduling Coordinators or Operators must resubmit outages as Forced in order to complete critical maintenance.

PG&E appreciates that CAISO has been responsive to feedback

PG&E appreciates the CAISO’s issuance of the *Transmission Induced Generation Outages* white paper. The resulting tariff changes clarified this issue and will improve the long-term reliability of the transmission system by reducing the uncertainty of transmission outages.

PG&E does not see any material difference between PRR 1074 and PRR 1122 and requests CAISO improve PRR 1122 to be more in line with the Tariff; more precisely focused on the “gaming” behavior that ought to be discouraged.

While the wording and the placement may have changed, both PRRs essentially say the same thing: resubmitting a previously scheduled planned outage as a forced outage could be viewed as submission of false information to the CAISO and/or taking an outage not authorized by the CAISO. PG&E’s objections to PRR 1074, and now PRR 1122, stem from the overly broad wording in both PRRs. This broad wording can be interpreted as being stricter than the actual tariff, which limits its review and punishments for Forced Outages that “*may have been the result of gaming or other questionable behavior.*”¹

¹ § 9.3.10.6 Review of Forced Outages. <http://www.caiso.com/Documents/ConformedTariff-asof-Jan1-2019.pdf>

PG&E requests CAISO improve PRR 1122 to be more in line with the Tariff; more precisely focused on the “gaming” behavior that ought to be discouraged. Additionally, the CAISO should improve the outage management process to eliminate the situations where Scheduling Coordinators or Operators feel they have no choice but to resubmit outages as Forced.

Improvements to PRR 1122

PG&E offers two constructive edits to PRR 1122:

1. Be more specific to the problem of “gaming” and more aligned to the tariff.

As SCE noted in their PRR 1074 comments, these PRRs can be interpreted as being stricter than the Tariff. The Tariff takes a more focused approach that is specific to discouraging “gaming” by considering ten factors when evaluating the appropriateness of resubmitting a forced outage. PG&E suggests making the language in PRR 1122 more consistent with the tariff. For example, PRR 1122’s language could be modified to read (PG&E’s edits in red):

“Resubmitting the outage could be viewed as submission of false information to the ISO and/or taking an outage not authorized by the ISO if it is determined to be the result of gaming (see § 9.3.10.6 Review of Forced Outages).”

2. Broaden the list of appropriate reasons for resubmission

There are several circumstances in the current process where Scheduling Coordinators or Operators have no choice but to resubmit a rejected Planned Outage as Forced. These reasons may be wide ranging and include:

- Further delay of the outage poses imminent risk to the equipment and/or people
- Regulatory requirements from Federal, State, and/or local agencies
- Physical circumstances surrounding the outage have changed

Unlike the gaming behavior that is apparently the motivator for PRR, the list of reasons for appropriate resubmission is not completely known. PG&E recommends making it clear in this PRR that this list of appropriate reasons for resubmission is not exhaustive (PG&E edits in red).

“Resubmission in the forced timeframe may be appropriate when the behavior is not due to gaming, such as where the physical circumstances surrounding the outage request changed between the planned; when due to regulatory requirements from Federal, State, and/or local agencies; or forced timeframes or where



further delay to the outage poses imminent operational risk to the transmission or generation equipment.”

Improvements to Outage management process

While improvements to the language of PRR 1122 are necessary, they are not sufficient to eliminate resubmissions of canceled planned outages or reduce inefficient outage cancellations where generation and transmission outages are cancelled (with no real short-term reliability benefit but incurring a material reliability cost from not being able to complete the maintenance in a timely manner). There are several challenging situations where Scheduling Coordinators or Operators feel they have no choice but to resubmit outages as Forced. The CAISO ought to work to improve the outage management process to eliminate these challenging situations. Doing so will result in a more liquid Resource Adequacy (RA) market and one where it will be easier for the CAISO to identify the inappropriate gaming behavior it wishes to eliminate.

The opaqueness, uncertainty, and lack of dialog in the current process leads to a less liquid and efficient RA market. PG&E would like the CAISO to address three areas in their outage management process:

1. **Transparency.** Currently, many Operators must assume a one-for-one replacement for all outages up until a week prior to the outage – far too late to offer any residual capacity to be offered into the market. If the CAISO were to be transparent in the criteria for outage cancellation, then Operators could be better informed in scheduling their outages, resulting in fewer cancelled planned outages and more supply of RA.
2. **Certainty.** CAISO should increase the certainty of an outage more than eight days in advance. Eight days does not allow enough time to sell residual RA or procure substitution if needed. Increasing the certainty further out will lead to more RA supply in the market.
3. **Rational.** Stakeholders have repeatedly described situations where the planned outage did not actually reduce reliability of the system nor the amount of RA available to the CAISO. For example, the cancelation of a solar resource at night and hydro facilities with little to no water in the reservoir. In these cases, there was no benefit to canceling the outage nor did these situations meet the criteria of “gaming” laid out by the tariff. These types of cancelations should not occur.
4. **Resolution.** CAISO should offer an expedited resolution mechanism by which Scheduling Coordinators or Operators could discuss a cancelled outage. In the irrational cancelation examples (above), Scheduling Coordinators or Operators have no other



option other than resubmitting the cancelled outage as Forced. If CAISO were to provide a resolution mechanism that could allow for approval of the planned outage or further communication on the need for cancellation, then fewer resubmissions would occur.

PG&E became aware of a situation where Scheduling Coordinators or Operators thought cancellations were inappropriate. In one instance, the Scheduling Coordinators or Operator provided substitution, yet the outage was still cancelled. In another, the Scheduling Coordinators or Operator was willing to pay RAIM penalties for lacking the substitution, but regardless the outage was still cancelled. These examples illustrate the need for improvements in transparency, certainty, and resolution (the previous three points). If substitution is provided, or paid for, the outage should not be cancelled. Improvements in these three areas would increase RA availability at no additional cost.