

February 12, 2019

**COMMENTS OF THE CITIES OF ANAHEIM, AZUSA, BANNING,
COLTON, PASADENA, AND RIVERSIDE, CALIFORNIA
ON PROPOSED REVISION REQUEST 1122**

In accordance with the Business Practice Manual (“BPM”) Change Management Process, the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (collectively, the “Six Cities”) provide their comments on Proposed Revision Request (“PRR”) 1122, titled “Inappropriate reporting of forced outages.” The CAISO claims that the proposed revisions to the Outage Management BPM for consideration in PRR 1122 add clarity to what the CAISO considers inappropriate behavior for reporting forced outages.

Through PRR 1122, the CAISO proposes to add language to the Outage Management BPM that states:

If the CAISO initially approves a requested planned transmission or generation outage and the CAISO subsequently disapproves the outage or withholds final approval, it is generally not appropriate for the PTO or scheduling coordinator for the generator to resubmit the same (or substantially similar) outage as a forced outage. Resubmitting the outage could be viewed as submission of false information to the ISO and/or taking an outage not authorized by the ISO.

The CAISO’s proposed language as quoted above is not simply a clarification of what the CAISO considered inappropriate behavior for reporting forced outages, but is a substantive change impacting the CAISO’s evaluation of outage requests. CAISO Tariff Section 9.3.6.1.1 for example, permits a Scheduling Coordinator to submit a new request for a forced outage if a request to change a schedule for maintenance is not approved by the CAISO. The CAISO’s proposed language would render the submission of the forced outage – which is expressly permitted by the Tariff – as an unauthorized outage or as submission of false information. This result is clearly inconsistent with the CAISO Tariff, and thus represents a substantive change that should not be adopted through the BPM Change Management Process.

Further, the CAISO’s proposal would treat as submission of false information those forced outages that have been submitted for a legitimate purpose. The fact that an outage was previously submitted as a planned outage does not automatically render it illegitimate if it must be re-submitted as a forced outage. Among other legitimate purposes, the outage may be necessary for maintenance or repair and may create reliability issues if not permitted. The Six Cities support the comments submitted by NCPA in response to PRR 1122, which explain that the CAISO ignores the need to work with specialized contractors in completing generator maintenance work, who cannot be easily re-scheduled for planned work in the event the CAISO disapproves a planned outage. In that case, NCPA explains that it may be necessary to convert the outage from a planned outage to a forced outage. The Six Cities agree that these issues arise

when scheduling contractors with long lead times to perform mandatory maintenance or required testing/calibrations. If the CAISO disapproves a planned outage, then the generator must choose between: (1) cancelling a contractor that may have been booked many weeks out and go out of compliance; or (2) submitting a forced outage. By characterizing the latter option as an unauthorized outage or submission of false information, the CAISO has created an unworkable situation for the generator.

The Six Cities also support the comments and appeals filed by Pacific Gas and Electric Company (“PG&E”) and Southern California Edison Company (“SCE”) in response to PRR 1074, through which the CAISO proposed substantively similar language as the language proposed in PRR 1122 be included in the Reliability Requirements BPM. The language the CAISO proposes through PRR 1122 raises the same issues as those identified by PG&E and SCE in response to PRR 1074. The CAISO did not address these issues through its submission of PRR 1122, and thus PG&E’s and SCE’s concerns persist and should be remedied.

Submitted by,

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