

February 26, 2019

**COMMENTS OF THE CITIES OF ANAHEIM, AZUSA, BANNING,
COLTON, PASADENA, AND RIVERSIDE, CALIFORNIA
ON PROPOSED REVISION REQUEST 1137**

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”) 1137, titled “Update to language for outages under the 24 hour rule.” The CAISO states that the proposed revisions are intended to update the language covering outages under the 24-hour rule.

Through PRR 1137, the CAISO proposes to add language to Section 5.2.1 of the Outage Management BPM listing the factors to consider when an outage cannot be initiated and completed within a twenty-four hour period. The CAISO also adds as an exception to the 30-day rule for scheduling planned outages of Significant Facilities “Outages that cannot be initiated and completed within a twenty-four hour period.”

Based on the Six Cities’ review, it appears that this exception to the 30-day rule should be revised to reference outages that *can* be initiated and completed within a twenty-four hour period, rather than those that *cannot*. This would be consistent with the language proposed in PRR 1138 - Congestion revenue rights 24 hour outage clarification. The Six Cities believe that the language proposed in PRR 1138 is correct and should also be adopted through PRR 1137. First, the exception that the CAISO replaced in Section 5.2.1 was for “Outages that are less than 24 hours in duration,” which lends itself to the assumption that the replacement language would also refer to outages that can be initiated and completed within the same period of time. Second, it would be more logical for the CAISO to allow for an exception to the 30-day rule for maintenance that can be completed within a short period of time, rather than maintenance that will last beyond twenty-four hours.

Assuming that the Six Cities’ interpretation of the intended nature of the exception is correct, and consistent with the proposed language in PRR 1138, the Six Cities propose the following changes to the CAISO’s revisions to Section 5.2.1:

The ISO emphasizes that the 30-day rule is not intended to prevent needed maintenance on significant facilities in circumstances where the 30-day rule cannot be followed without adversely affecting the grid reliability. Accordingly, the following exceptions to the 30-day rule will be used to approve outages without classifying them as forced:

1. Outages that ~~cannot~~ can be initiated and completed within a twenty-four hour period.
2. Outages previously approved by ISO that are moved within the same calendar month either by the ISO or by request of the PTO.

3. ISO approved allowable transmission maintenance activities during restricted maintenance operations as covered in ISO operating procedure E-509A.
4. The most current list of specific Significant Transmission Equipment will be covered in ISO Operating Procedure 3210.

The ISO will review the history of these types of exceptions annually to determine whether they are effective in promoting adequate information for CRR purposes, and whether use of these exceptions should continue to be classified as planned.

With regards to ~~determining whether an~~ outages ~~that cannot~~ can be initiated and completed within a twenty four hour period, there are additional factors to consider.

Submitted by,

Bonnie S. Blair
Rebecca L. Shelton
Thompson Coburn LLP
1909 K Street, N.W., Suite 600
Washington, DC 20006
bblair@thompsoncoburn.com
rshelton@thompsoncoburn.com
202-585-6900

Attorneys for the Cities of Anaheim, Azusa,
Banning, Colton, Pasadena, and Riverside,
California