

February 28, 2019

**COMMENTS OF THE CITIES OF ANAHEIM, AZUSA, BANNING,
COLTON, PASADENA, AND RIVERSIDE, CALIFORNIA
ON PROPOSED REVISION REQUEST 1138**

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”) 1138, titled “Congestion revenue rights 24 hour outage clarification.” The CAISO states that the proposed revisions are intended to provide clarification as to how the 24 hour rule is applied.

Through PRR 1138, the CAISO proposes to add language to the Congestion Revenue Rights BPM that recognizes an exception to the rule that requires at least 30-days’ notice of transmission outages for rule for “Outages that can be initiated and completed within a twenty-four hour period.” The CAISO also revises the BPM to list the factors to consider when an outage cannot be initiated and completed within a twenty-four hour period.

For consistency with the CAISO’s exception from the 30-day notice rule for outages that *can* be initiated and completed within a twenty-four hour period, and consistent with the Six Cities’ proposed revisions to the Outage Management BPM in PRR 1137, the Six Cities propose the following changes to the CAISO’s revisions:

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. If a transmission operator is considering one single outage for a single element, the operator must report that outage based on how long that single outage record lasts. If the outage cannot be commenced and completed within a 24 hour period, even if the 24 hour period spans over two calendar days the outage must be reported consistent with the time line specified above. In some cases, transmission operators are considering more complex outages that are composed of a series of outages of the same transmission facility. The CAISO understands that some operators may consider such outages as discrete and separate outages that commence and complete within a 24 hour period. That interpretation is inconsistent with the tariff requirement. Although each outage may be identified with its specific outage identifier, if there are multiple outages impacting the same transmission facility, then the transmission operators must consider the time span between the end time of the last outage identifier and start time of the first outage identifier to determine if the series of outages must be submitted 30 days prior to the month the outage is to begin. For example, if there is an outage impacting LINE A for a given day of a month for 5 hours (from 1 pm to 6 pm) and then another outage submitted for the next day impacting the same Line A for 10 hours (from 8 am to 4 pm) then these two outages are required to be reported under the 30 day rule. This is because the period from 1pm on day one to 4pm of next day spans more than 24 hours. The CAISO has determined that outages on a specific transmission facility that cannot be commenced and completed within a 24 hour

period will impact the power flow in the CRR DC FNM even though the transmission operator starts and stops their work each day.

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