

**PRR 1138 Comments
Congestion revenue rights 24 hour outage clarification**

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on PRR 1138, “Congestion revenue rights 24 hour outage clarification.” PG&E opposes this PRR in its entirety because the premise is flawed, it is not consistent with the CAISO tariff, it is unclear how it improves the CRR process, and it creates a heavy burden on the outage submitters trying to comply with the outage process. Lastly, PG&E has concerns about how PRR 1138 will affect the CRR market and allocations. PG&E would like to further discuss such concerns with the CAISO.

PG&E acknowledges the complexities of the CRR process facing the CAISO. PG&E would like to work with the CAISO to identify a path forward that is more tenable and feasible. Given the intricacies of CRR matters, PG&E would also like the CAISO to consider addressing such concerns in a stakeholder initiative and not via the BPM Change Management process.

- 1) The “premise is flawed”: The following is an excerpt of the language PRR 1138 adds to Section 10.3.1:

“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.”

Based on the above language, PG&E is greatly concerned with the implications of PRR 1138. PG&E interprets that, hypothetically, if one maintenance outage is requested on the first day of the month (for a single hour) and another maintenance outage is requested on the same equipment (3 weeks later, with a completely separate description of work) for a single hour, then both outages must be submitted as “CRR impacting outages.” This is due to the time between the start time (of the first outage) and the end time (of the second outage) exceeds 24 hours. However, it would be acceptable to submit an outage for 20 hours as a “CRR exempt

outage” as long as it begins and ends within a single day. The rationale behind this is unclear to PG&E.

There is no scenario where the outage information provided by the two 1-hour outages is more significant than the single-day 20-hour outage to the CRR Market. Since the CRR studies are either 1-month or 3-months (for the annual process) in duration, a 2-hour total outage duration is statistically insignificant for either of those markets to consider and would not be used in the CRR study. It could be argued that the 20-hour outage is also statistically insignificant, which is why the 24-hour rule was instituted in the first place.

- 2) It is not consistent with the CAISO tariff: PRR 1138 includes language that declares outages on the same equipment with multiple outage submissions:

“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.”

However, the CAISO Conformed Tariff in Appendix A defines a maintenance outage as follows:

Maintenance Outage

“A period of time during which an Operator (i) takes its transmission facilities out of service for the purposes of carrying out routine planned maintenance, or for the purposes of new construction work or for work on de-energized and live transmission facilities (e.g., relay maintenance or insulator washing) and associated equipment; or (ii) limits the capability of or takes its Generating Unit or System Unit out of service for the purposes of carrying out routine planned maintenance, or for the purposes of new construction work.”

Based on this excerpt, a maintenance outage is only for the “period of time that the Operator takes its transmission facilities out of service for the purposes of carrying out routine planned maintenance.” Once the equipment has been returned to service, the maintenance outage is completed, and the equipment is once again turned over to the CAISO for operational control.

If the Operator chooses to take transmission facilities out of service at a future date, there is nothing in the definition to indicate that the time between the first outage ending and the second outage starting can be considered on a maintenance outage.

Additionally, the ISO Tariff in section 36.4.3.2 has the following language:

“CRR Transmission Maintenance Outages are those Outages that may have a significant effect upon CRR revenue adequacy, which are defined as outages that affect transmission facilities on the CAISO Controlled Grid that:

- (a) are rated above 200 kV; or*
- (b) are part of any defined flow limit as described in a CAISO Operating Procedure; or*
- (c) were out of service in the last three (3) years and for which the CAISO determined a special flow limit was needed for real-time operation.*

CRR Transmission Maintenance Outages consist only of outages that: (1) meet the criteria specified above; (2) involve system configuration changes that affect power flow in the CRR DC FNM; and (3) cannot be initiated and completed within a twenty-four (24) hour period.”

Thus, the CRR Transmission Maintenance Outages are defined in the tariff as those that cannot be initiated and completed within a twenty-four (24) hour period. A maintenance outage is completed when the equipment is returned to service. Even if one considers it a 24-hour period of outage time on the same equipment (which is not what is stated) the changes proposed in PRR 1137 do not meet that criteria.

- 3) PRR 1138 Does Not Enhance the CAISO’s CRR Process: As the PRR is written, there is no limitation for the amount of time between separate outage submissions (within a given month), no requirement that the work being done be must substantially similar between the separate outages and no total “outage” time between such outages to trigger inclusion as outages required to be submitted in the CRR time frame. In theory, a one-minute outage early in the month and a one-minute outage at the end of the same month on the same equipment would require both outages to be submitted in the CRR time frame, even if one was for a breaker exercise and the other for a relay adjustment. PG&E would like to understand how this enhances the CRR process.

If the Operator took out the same equipment 3 days in a row, with the same equipment outaged and for the same purpose – then it might possibly be useful for the CAISO to consider. But even then, if each of the daily outages were for 9-hours each, is the CAISO going to sell less CRR on that equipment/path and forgo the opportunity for the other 700 hours of that month? There is certainly a point when the outage hours become significant to the CRR process, but 27 hours/720 hours (< 4%) is not.

PG&E would like to collaborate with the CAISO to propose alternative language to PRR 1138. One consideration is for the proposed language to address multiple outages. Perhaps these multiple outages can be required to (1) have a total amount of outage hours, (2) the dates to be reasonably contiguous, and (3) have similar outage work.

- 4) PRR 1138 creates a heavy burden on the outage submitters: Outages are submitted for routine maintenance, compliance inspections, capital projects and addressing findings in the field. At PG&E, we have 6 different outage planners who process outages from 11 different system operators who manage several hundred independent outage submitters. While PG&E endeavors to “bundle” or combine as many work requests as possible, it is often not feasible due to competing priorities of outage submitters. Such considerations include compliance deadlines, environmental restrictions, availability of parts, crew availability, weather changes, etc.

PRR 1138 would require outage planners to check every single outage submitted on CRR equipment to see if any other jobs have been submitted for the month regardless of duration. The vast majority of the time, they would not find anything but would have to look each and every time an outage is submitted or rescheduled. If they did happen to find a second outage, then one or both outages would probably have to be rescheduled to meet the CRR time frame (if they could not be combined). This is because neither outage submitter would know they had to meet the enhanced submission times required for CRR equipment. This effort would substantially increase the amount of time and resources required to process every CRR equipment outage.

In sum, PG&E appreciates the opportunity to provide feedback on PRR 1138. PG&E recognizes the complexities of CRR issues facing the CAISO and looks forward to working with the CAISO on improving the proposed language.