



November 2, 2021

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Re: California Independent System Operator Corporation
Docket Nos. ER08-1178-000 and EL08-88-000**

**120-day Exceptional Dispatch Informational Report
April 1, 2021 through September 30, 2021**

Dear Secretary Bose:

The California Independent System Operator Corporation (CAISO) submits the attached informational report to include Exceptional Dispatch data for the period (including the summer months) from April 1, 2021 through September 30, 2021.

In its September 2009 Order, the Commission directed the CAISO to file reports every 120 days that describe the status of the CAISO's efforts to reduce the frequency of Exceptional Dispatch and the status of the CAISO's development of operational and product enhancements that would reduce reliance on Exceptional Dispatch.¹ The 120-day informational report is in addition to the Table 1 and Table 2 monthly Exceptional Dispatch reports the CAISO files in the above-referenced dockets.²

¹ *Cal. Indep. Sys. Operator Corp.*, 128 FERC ¶ 61,218, at PP 50-51 (September 2009 Order). The Commission explained that it “does not intend to notice these future status reports or to issue orders on these in the future, as these reports are for informational purposes only.” *Id.* at P 51 n.66.

² *Id.*, and *Cal. Indep. Sys. Operator Corp.*, 131 FERC ¶ 61,100 (2010). The CAISO now files both Table 1 and Table 2 at the same time on the 15th of each month.

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Please contact the undersigned with any questions regarding this filing.

Respectfully submitted,

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California ISO

120-day Exceptional Dispatch Report

**Prepared by
California Independent System Operator**

November 2, 2021

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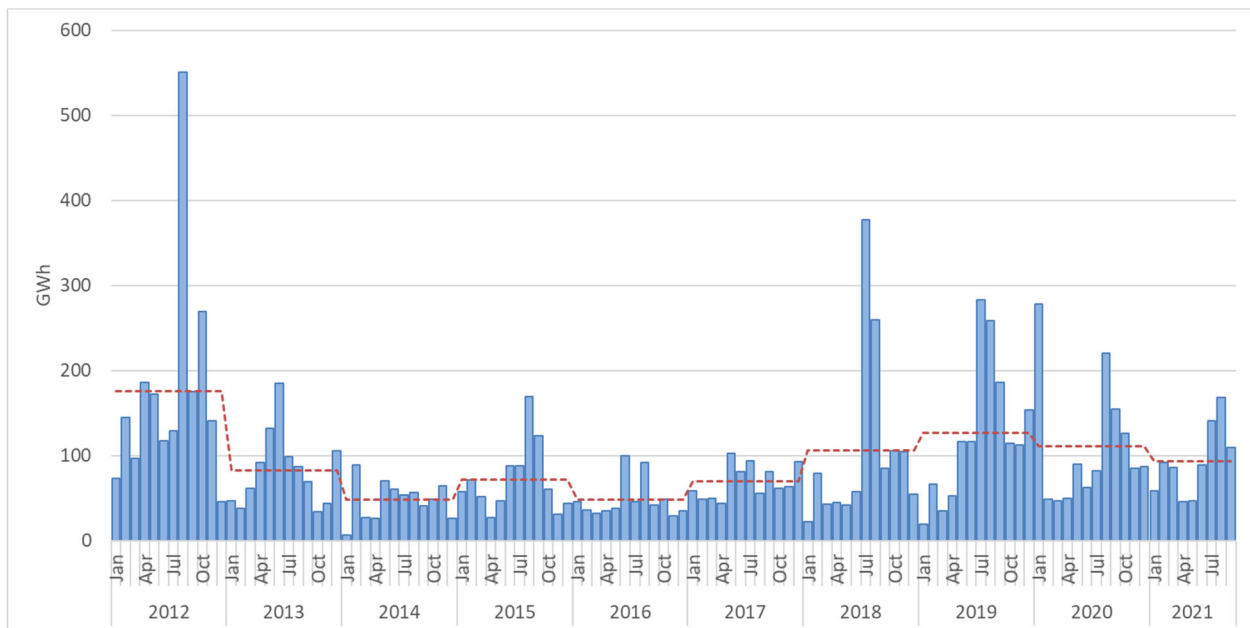
1. Introduction

This informational report by the California ISO (CAISO) provides an update to the Commission and market participants on the exceptional dispatch metrics and the measures the CAISO took to reduce reliance on exceptional dispatch for the period from January 2012 through September 2021. This report covers the 120-day period from April 1, 2021 through September 30, 2021¹.

2. Exceptional Dispatch Data and Reports

As shown in Figure 1 below, the year-to-date annual average volume of exceptional dispatches for 2021 is lower than 2020 due to high volumes of exceptional dispatches in the month of August and September for 2020. The yearly average volume has remained relatively stable at low levels for recent years with the exception of peak summer conditions when exceptional dispatches are necessary to manage contingencies as evident from the summer months in 2020 and 2021. The increase in August 2021 exceptional dispatch was primarily due to peak demand conditions and high temperatures along with fires. The volume of exceptional dispatches for April 2021 - September 2021 was very low as compared to April 2020 - September 2020.

Figure 1 Exceptional Dispatch Volume from January 2012 to September 2021²



In August 2021, due to a heat wave along with fires, it was necessary to send exceptional dispatch instructions to resources to meet the evening ramp. The majority of the volume of

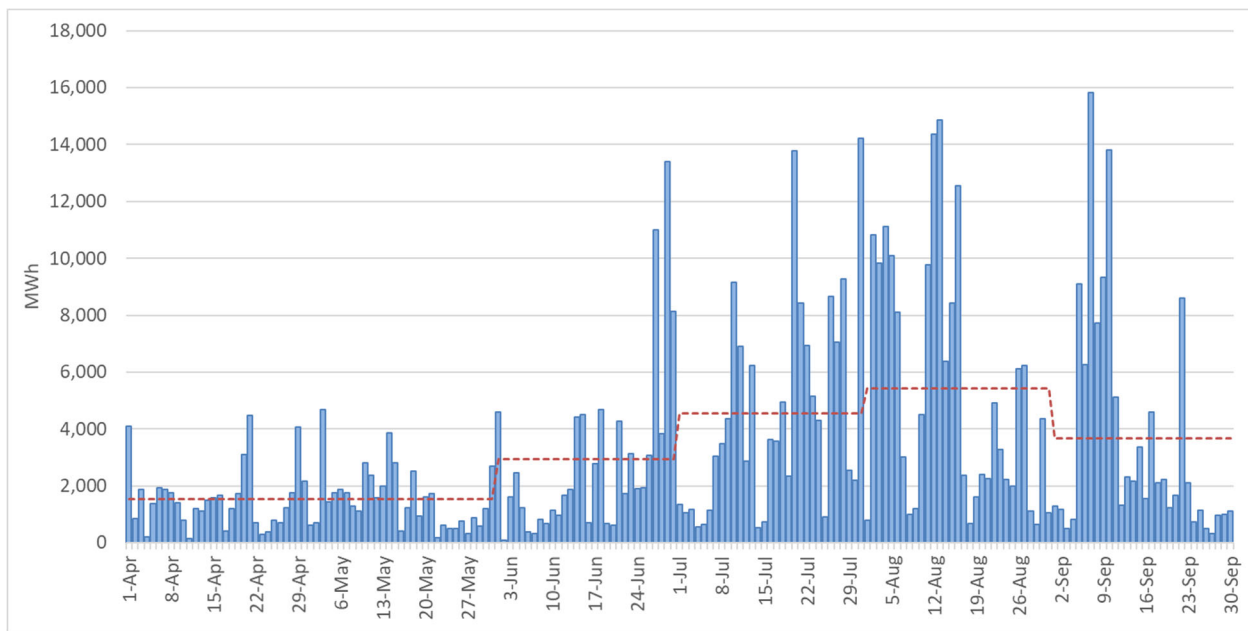
¹ The ISO's 120-day reports are available on the ISO website at: <http://www.caiso.com/rules/Pages/Regulatory/RegulatoryFilingsAndOrders.aspx>

² The 2021 data in Figure 1 is through September 30, 2021. Prior to submitting the report, there was insufficient time to update the labels in Figure 1.

exceptional dispatches were due to ramping capacity, load forecast uncertainty and planned transmission outage and reliability assessment as shown in Figure 3. As explained in Operating Procedure 2330C³, Reliability Assessment is the reason that encompasses Control Point (CP), Interconnection Reliability Operating Limit (IROL), System Operating Limit (SOL) and congestion related EDs, to mitigate reliability issues identified through the real – time assessment tools such as Real Time Contingency Analysis (RTCA), Voltage Stability Analysis (VSA), Dynamic Stability Analysis (DSA) and/or Operating Procedure (OP) or offline study.

These exceptional dispatches were driven by ramping capacity (about 35% of total exceptional dispatch volume), load forecast uncertainty (about 18% of total exceptional dispatch volume), planned transmission outage (about 14% of total exceptional dispatch volume), reliability assessment (about 11% of total exceptional dispatch volume), as shown in the Figure 4. Figure 4, shows the hourly pattern of exceptional dispatch volume for April 2021 to September 2021.

Figure 2 Daily Exceptional Dispatch Volume from April 2021 to September 2021



³ Operating Procedure 2330C - <http://www.aiso.com/Documents/2330C.pdf>

Figure 3 Daily Exceptional Dispatch Volume for April 2021 to September 2021 by Reason

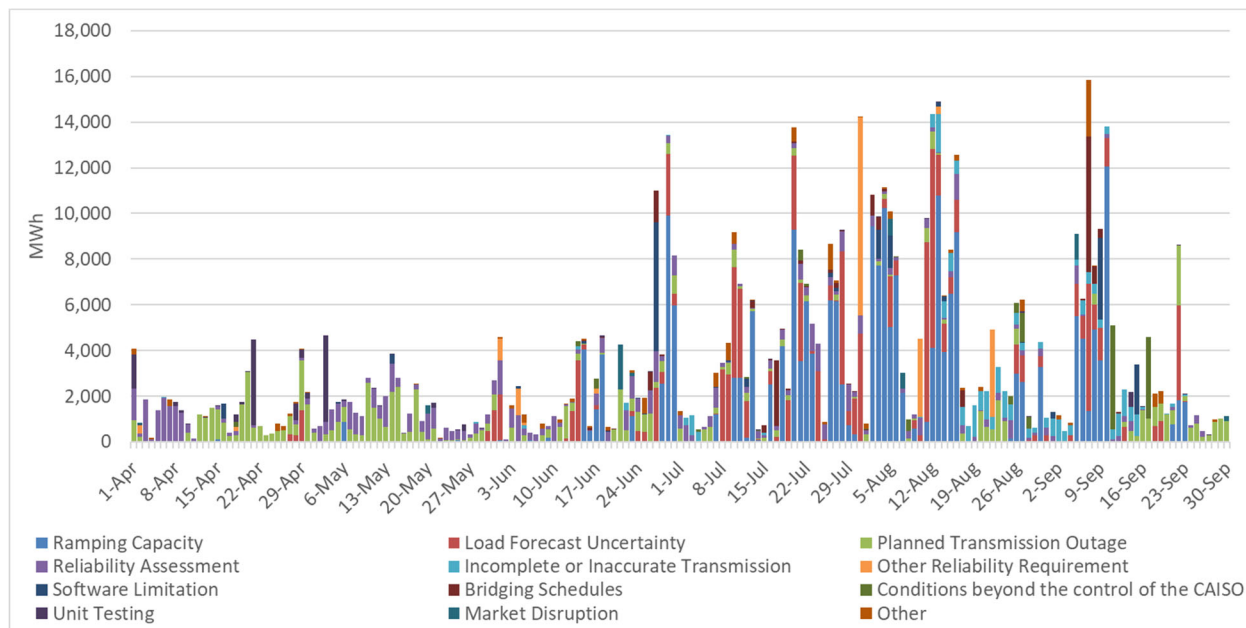
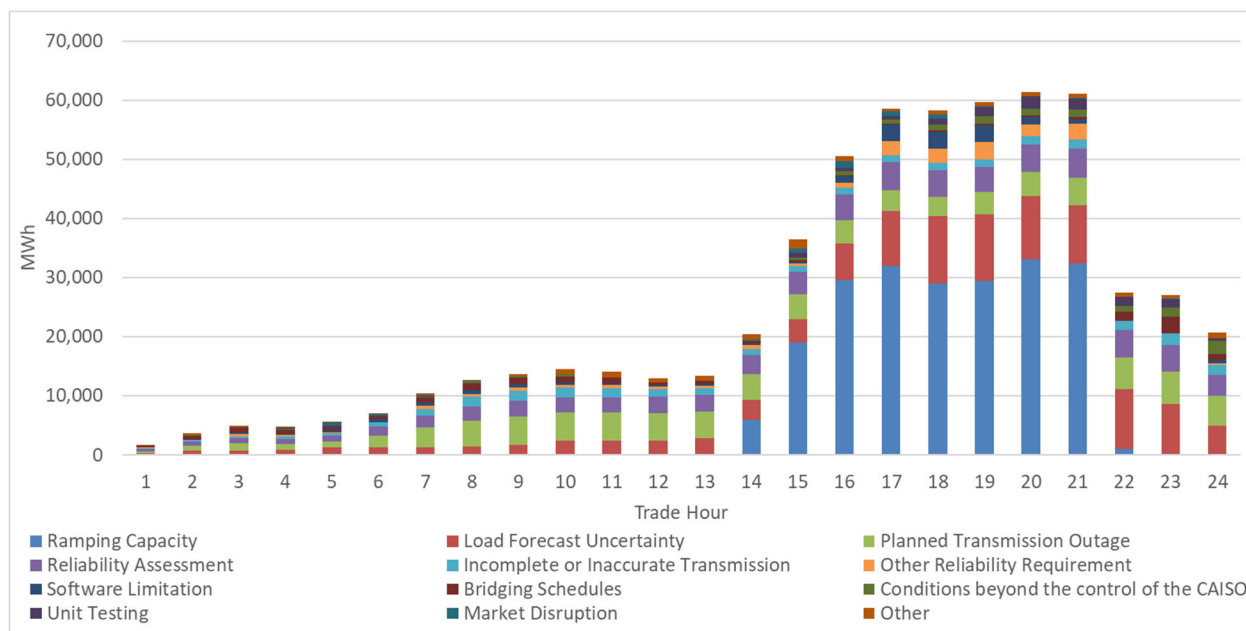


Figure 4 Hourly Exceptional Dispatch Volume for April 2021 to September 2021 by Reason



To comply with Commission directives and inform the market, as reflected in orders and the CAISO tariff, the CAISO produces and files two monthly exceptional dispatch reports in Docket No. ER08-1178, in addition to the 120-day reports that the CAISO is now resuming. Because the necessary information is available, the CAISO is issuing the Chart 1 and Chart 2 reports on the

15th of the month. Previously, the Chart 2 report was filed on the 30th of the month. The CAISO has filed the Table 1 and Table 2 reports each month. These monthly reports provide the market with the most recent summary of exceptional dispatch activity and associated costs.

The monthly reports are also available on the CAISO's website at:

<http://www.aiso.com/market/Pages/ReportsBulletins/Default.aspx>.

The CAISO also publishes a monthly market performance report at: <http://www.aiso.com/market/Pages/ReportsBulletins/Default.aspx>. This monthly report highlights the frequency and cost of exceptional dispatch as a subset of the broader category of operator intervention. The report is published approximately three weeks after the end of every month and is based on preliminary settlement data available about 10 days after the end of the month.

Additional information is also explained in greater detail in the Market Performance Metric Catalog that the CAISO issues on a monthly basis. This report provides the explanation and context for each market metric, including information on exceptional dispatch. It is available at:

<http://www.aiso.com/market/Pages/ReportsBulletins/Default.aspx>.

The CAISO also provides a regularly scheduled forum for discussing issues, including exceptional dispatch – the Market Performance and Planning Forum meetings that the CAISO holds every quarter. These meetings provide a venue for high-level dialogue on release planning, implementation, and new market enhancements. Agendas for the meetings cover items of importance to stakeholders, and includes general metrics of the ISO market performance, including Exceptional Dispatch metrics. Meeting agendas, presentations, and stakeholder comments are posted on the Market Performance and Planning Forum webpage:

<http://www.aiso.com/Documents/Market%20performance%20and%20planning%20forum>.

CERTIFICATE OF SERVICE

I certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California, this 2nd day of November, 2021.

Is/ Anna Pascuzzo
Anna Pascuzzo