

Questions and Answers on Forced Outage Reporting Requirements – June 4, 2007 (Updated June 29, 2007)

Summary

This document provides responses to recent questions and comments received by the CAISO regarding the Generating Unit Forced Outage reporting requirements and the SLIC Real Time Availability Management (RTAM) enhancements.

Please bear in mind that this document is not an authoritative interpretation of the CAISO Tariff. Exclusive authority to interpret the Tariff rests with the FERC. Although the descriptions in this document are intended to be consistent with the Tariff, in the event of any difference Market Participants are obligated to comply with the requirements of the Tariff as interpreted by the FERC.

Reporting Requirements

Question/Comment 1:

Is a Forced Outage Report required for a reduction in availability of a hydro unit caused by a low water level?

Answer 1:

A reduction in availability of a hydro unit caused by a low water level should be reported using the NERC GADS cause code 9135, "External/Lack of Water." This will result in the Outage being classified in SLIC as an "Ambient Outage," which is a sufficient explanation to satisfy the tariff requirement. Additional details are not required, and thus a Forced Outage Report is not necessary.

Question/Comment 2:

Is a Forced Outage Report required for a reduction in availability of a thermal unit caused by a high ambient temperature?

Answer 2:

A reduction in availability of a thermal unit caused by high ambient temperature should be reported using the NERC GADS cause code 9693, "Regulatory, Safety, Environmental/Other Misc. Operational Environmental Limits -- Gas Turbine Units." This will result in the Outage being classified in SLIC as an "Ambient Outage," which is a sufficient explanation to satisfy the tariff requirement. Additional details are not required, and thus a Forced Outage Report is not required.

Question/Comment 3:

The CAISO may classify a Planned Outage that is extended as a Forced Outage if the market participant requests the extension later than 11:30 am one day prior to the starting date of the Outage. In this case, a separate Forced Outage Report should not be required, as the market participant has already provided a description of the cause of the Outage and the remedial actions taken when the Outage was originally scheduled.

Answer 3:

The CAISO agrees that a separate Forced Outage Report is not required in the case of a Planned Outage that is extended, as long as the cause of the extension is related to the Planned Outage. In this case, the market participant has already explained the Outage and the CAISO has accepted the

explanation when it originally approved the Outage, which satisfies the tariff requirement. In the case that a Planned Outage is extended for a reason other than the cause of the original Outage, the market participant should create a separate "Outage Card" in SLIC.

Question/Comment 4:

The CAISO may designate an Outage as a Forced Outage if the Outage is scheduled less than three working days in advance. In this case, a separate Forced Outage Report should not be required, as the market participant has already provided a description of the cause of the Outage and the remedial actions taken when the Outage was originally scheduled.

Answer 4:

A market participant may request that the CAISO classify an Outage scheduled less than three working days in advanced as a Planned Outage, for which a Force Outage Report is not required. The CAISO will classify such an Outage as a Planned Outage as long as the Outage does not have a reliability impact to the system and the SC made a good faith effort to schedule the work through the CAISO. Otherwise, the Outage is considered a Forced Outage, for which a separate Forced Outage Report is required.

Question/Comment 5:

"As available" Qualifying Facilities, which supply energy with a profile that resembles a wind Generating Unit should not have to report availability as the output of these Generating Units is constantly changing, making the availability report of little value.

Answer 5:

The CAISO does not consider normal variations in the output of Qualifying Facilities for which the output depends on a process separate from the production of electricity to represent changes in the unit's maximum output capability. As such, these normal variations are not required to be reported. Aside from these normal variations in output, participants are required to report reductions in the maximum output capability of a Qualifying Facility if a Participating Generation Agreement (PGA) for the unit has been entered into with the CAISO (or if the unit is a Resource Adequacy Resource) and the reduction meets the reporting threshold.

Question/Comment 6:

There should not be a penalty for failing to report a reduction in Generating Unit availability due to a transmission limitation within 30 minutes as such as reduction is not due a change in the output capability of the Generating Unit.

Answer 6:

A Generating Unit Operator should immediately inform the CAISO of any transmission outage that could affect its maximum output. See CAISO Tariff Section 4.6.1.1. Although failure to do so may violate section 4.6.1.1, it would not be subject to the financial sanction specified in section 37.4.1.2, because a transmission outage is not a "change in the maximum output capability" of the Generating Unit. See CAISO Tariff Section 9.3.10.2.1.

Question/Comment 7:

When is an Outage "discover[ed]"? Is it the time when the operations center learns of the Outage or is it the time that personnel at a remote generation site first observe the conditions?

Answer 7:

In administering the tariff, DMM will assume that an Outage is "discover[ed]" as soon as the Operator determines the change in the unit's maximum output capability. The Operator is bound to the knowledge of its personnel who have primary responsibility for control of the Generating Unit. Whether that means an operator on-site or someone in the operations center is a question that the CAISO intends to leave to Operators to answer.

Question/Comment 8:

After a market participant makes an availability report using RTAM, is the participant required to go into the SLIC Web Client and edit the default information in the SLIC Outage Card created by RTAM as a result of the availability report?

Answer 8:

Market participants are not required to edit the default information in a SLIC Outage Card created by an availability report made through RTAM.

Question/Comment 9:

In the event that a Generating Unit is out of service on a Planned Outage but needs to start for a short period of time for testing, the CAISO requires that a market participant to create an additional SLIC Outage Card to notify the CAISO that the unit will be temporarily started up for testing. If this Outage Card is created less than three working days before the unit starts up for testing, it will be classified as a "Forced Outage," which will appear to require that the participant submit a Forced Outage Report, when in reality there was not a Forced Outage.

Answer 9:

In the event that a market participant submits an Outage Card to report that a unit is starting up for testing, the market participant can request that the CAISO update the Outage Card to indicate that it represents a Planned Outage. This will avoid the Outage Card appearing to require a Forced Outage Report.

Question/Comment 10:

Do the Forced Outage reporting requirements and associated penalties for non-compliance apply to dynamically scheduled System Resources?

Answer 10:

The Forced Outage reporting requirements and associated penalties for non-compliance do not apply to dynamically scheduled System Resources – they are only applicable to Generating Units in the CAISO control area. However, CAISO Tariff Section 8.10 requires operators of System Resources, to notify the ISO immediately whenever they become aware that an Ancillary Service is not available in any way.

Question/Comment 11:

If a market participant discovers the potential for a Forced Outage before it actually occurs, when must it report the Forced Outage? For example, if a Generating Unit is out of service on a Planned Outage and cannot return to service by the planned return time, the Outage may be designated as a Forced Outage. In this case, when must the participant notify the CAISO that the reduction in availability will extend for a longer period of time than originally planned?

Answer 11:

Participants must give the CAISO as much notice as possible of situations likely to result in Forced Outages. See CAISO Tariff Section 9.3.10.2. If prior notice cannot be given, participants are required to notify the CAISO of reductions in availability above the reporting threshold within 30 minutes of discovering the reduction in availability. See CAISO Tariff Section 9.3.10.2.1. In administering Section 9.3.10.2.1, the CAISO will assume that the time a market participant discovers a reduction in availability is no earlier than the time the reduction actually begins.

Question/Comment 12:

If a participant reports the time it discovered a Forced Outage using the procedure described in "Generating Unit Forced Outage Reporting using RTAM," Appendix B (i.e. through completing an "Add Information Request," with a Reason Code of "Other," through the SLIC Web Client), how does the participant view the information submitted?

Answer 12:

The information submitted can be viewed by double-clicking the row showing the "Add Information Request" in the grid presented under the "Event History" tab on the Outage Card screen in the SLIC Web Client, noting the Request ID, and then entering the Request ID in the "Request ID" box in the toolbar at the top of the SLIC Web Client screen.

Question/Comment 13:

If a Generating Unit trips while starting up and is restarted within 10 minutes, is an availability report required?

Answer 13:

An availability report would not be required in this situation – availability reports are only required for reductions that last for 15 minutes or longer. See CAISO Tariff Section 9.3.10.2.1.

Question/Comment 14:

What digital certificate do market participants use to access the RTAM application?

Answer 14:

Participants can access the RTAM application using they use the same certificates they are using for the SLIC Web Client.

Question/Comment 15:

If a Resource ID is comprised of many units that individually are smaller than the reporting requirement, yet the Resource ID total is above the reporting requirement, does the reporting requirement apply?

Answer 15:

SLIC accepts reports at the Resource ID level, which typically corresponds to a "Generating Unit" -- which is the reporting level specified by the tariff. Note that the CAISO tariff defines a "Generating Unit" as "an individual electric generator and its associated plant and apparatus whose electrical output is capable of being separately identified and metered or a Physical Scheduling Plant". If multiple units are aggregated into a Physical Scheduling Plant (i.e. a single Resource ID), then the aggregate MW impact at the Resource ID level of any reduction in the availability of the individual units would determine if the reporting requirements apply. Availability reporting requirements apply if there is a derate of a Generating Unit of at least 10 MW (or 5% of PMax, whichever is greater), and an explanation of a Forced Outage (i.e., Forced Outage Report) is required for a derate of either 40 MW (or 10% of PMax, whichever is greater), or the complete outage of a Generating Unit (regardless of size). See CAISO Tariff Sections 9.3.10.2 and 9.3.10.5.

Question/Comment 16:

Are separate Forced Outage Reports required for temporary limitations in the output of a Generating Unit that occurs due to its designed operation, as reported to the CAISO using a SLIC "Normal Card"?

Answer 16:

A separate Forced Outage Report is not required in these circumstances.

Question/Comment 17:

Is a Forced Outage Report required for a Planned Outage that is extended and classified as a Forced Outage because the participant requested the extension later than 11:30 am one day prior to the starting date of the Outage?

Answer 17:

As described in Answer 3, above, a separate Forced Outage Report is not required under routine circumstances in the case of a Planned Outage that is extended, as long as the cause of the extension is related to the Planned Outage. However, CAISO Tariff 9.3.10.5 requires participants to promptly provide information that may be requested by the CAISO to review any Forced Outage.

RTAM Modifications

Question/Comment 1:

RTAM does not have a distinct input field to report the time a market participant discovers an Outage. This is a critical issue that needs to get resolved – some Outages require the market participant to enter the Outage discovery time, in addition to entering the Outage start time. The process currently provided by the CAISO does not enable reporting the discovery time through RTAM and requires an additional step using the SLIC Web Client. This could result in the discovery time of an Outage being inadvertently omitted and cause a report that is actually submitted within the required time appear to be submitted late. This will cause the participant and the CAISO to expend unnecessary effort investigating an apparent violation because the participant inadvertently did not report the discovery time.

Answer 1:

The CAISO agrees that a distinct input field for reporting Outage discovery time in RTAM will be useful and is evaluating how to provide it. However, the CAISO believes that the procedure that it has established for reporting discovery time through the SLIC web client, in the event that a separate discovery time needs to be reported, is reasonable and adequate for the short-term (this procedure is summarized on page 12 of “Generating Unit Forced Outage Reporting Using RTAM” posted at <http://www1.caiso.com/1bc2/1bc29fe4497a0.pdf>). Market participants do not have to report Outage discovery time unless (1) the Outage discovery time is different than the Outage start time, and (2) the participant did not report the Outage within 30 minutes of the start time. The CAISO also notes that the discovery time of an Outage is not required to be reported to the CAISO within the same 30-minute-timeframe as the initial availability report and that market participants have the ability to revise a SLIC Outage Card to make any needed report of a discovery time they may have inadvertently missed. Until a discovery time field is added to RTAM, the CAISO Department of Market Monitoring will continue to provide informational reports to market participants showing items that appear to represent late reports so that Market Participants can make any needed reports of discovery times before the Department of Market Monitoring starts to formally investigate a potential violation.

Alternatively, market participants developing applications to report Outages through the SLIC API, can establish a discovery time field within the application and have the application submit discovery time information in the “Reason Text” field through an “Add Information Request” event, using the “Reason Code” “Other.”

Question/Comment 2:

When typing in the RTAM “Resource” field, only one character is accepted, which is not consistent with SLIC.

Answer 2:

The RTAM Resource field is the type of dropdown that cycles through the items starting with the character typed. Each type of dropdown has its own advantages. This will be taken into consideration for any future releases of the clients.

Question/Comment 3:

There are duplicate resources in the RTAM “Resource” field.

Answer 3:

This was an issue with the test system’s data and has since been resolved

Question/Comment 4:

In the RTAM screen, there is not a default phone number. This field must be completed by the participant each time to submit an RTAM report.

Answer 4:

The RTAM Quick Entry screen is pre-populated with the phone number that has been used in the SLIC Web Client. If an outage is submitted with the web client, the phone number given will be saved and then will be available in the RTAM Quick Entry screen.

Question/Comment 5:

Once a phone number is submitted through RTAM, it is not present when the applicable Outage Card is opened in SLIC.

Answer 5:

As per SLIC's current functionality, the phone number is available on the Request Details display not the Outage display.

Question/Comment 6:

In the bottom panel of the RTAM "System Notifications" screen, resources are present that would never require a Forced Outage report (e.g. dynamic system resources, QFs)

Answer 6:

See Answer 5 in Reporting Requirements section, above.

Question/Comment 7:

Outage IDs were listed in the RTAM "System Notification" screen that required "Start Outage Requests" of "End Outage Requests." These items were completed but the Outage IDs remained listed in the "System Notification" screen.

Answer 7:

The System Notification screen does not automatically refresh. Click the 'Refresh' button on the display to refresh data.

Question/Comment 8:

Will the RTAM screen be available through a menu in the SLIC client or do two separate windows have to be open?

Answer 8:

The RTAM Interim User Interface and the SLIC Web Client are two separate applications and can be accessed by separate links located at <https://slic.caiso.com>. When both applications are launched, you will have two separate windows open.

Question/Comment 9:

Will the outages be linked between the RTAM screen and the SLIC interface?

Answer 9:

Outages created using the RTAM Quick Entry Screen can be viewed and modified in the SLIC Web Client as per current functionality.

Question/Comment 10:

Can an Outage Card be opened by double-clicking an item on the RTAM "System Notification" screen?

Answer 10:

Outage Cards can not be opened within the RTAM Interim User Interface. The new interface only implements the new RTAM Quick Entry and System Notifications functionality.

Question/Comment 11:

Why is an availability report made through RTAM restricted to a 4-hour duration?

Answer 11:

An availability reporting using RTAM is limited to no more than 24 hours in the past and no more than 4 hours in the future from the beginning of the next hour. Since typical use of RTAM Quick Entry screen is during times when not all information is known and for the purpose of quick entry doesn't provide visual checks to view concurrent outage data like the SLIC Web Client does, the report times are restricted to limit impact of update to historical data and forward markets. The SLIC Web Client can be used at anytime to make available reports without these restrictions.

Question/Comment 12:

From the web service request log or the submission log, it shows 10 ids. Is there a way to view more if they are present and can they be linked to the SLIC outage?

Answer 12:

Retaining this information increases memory used by the application. Since the main purpose of this feature is to demonstrate the use of the API and help development efforts, the log only retains the last 10 calls made. Developers can capture the calls being made for reference as they are testing the functionality.

Question/Comment 13:

Can field for notification time be added to the RTAM screen?

Answer 13:

See Answer 1, above.