

May 15, 2024

The Honorable Debbie-Anne Reese
Acting Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**RE: California Independent System Operator Corporation
Docket Nos. ER06-615-___ and ER07-1257-___
Market Disruption Report**

Dear Secretary Bose:

The California Independent System Operator Corporation (CAISO) hereby submits its monthly report covering Market Disruption reportable events under Section 7.7.6 of the CAISO Tariff that occurred from March 16, 2024 to April 15, 2024.¹

Please contact the undersigned with any questions.

Respectfully submitted

By: /s/ Andrew Ulmer

Roger E. Collanton
General Counsel
Andrew Ulmer
Assistant General Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630
Tel: (916) 608-7209
Fax: (916) 608-7222
aulmer@caiso.com

¹ The CAISO submits the Market Disruption report pursuant to *California Independent System Operator Corp.*, 126 FERC ¶ 61,211 (2009) and Section 7.7.6 (d) of the CAISO Tariff (CAISO Tariff Section 7.7.15 was moved into Section 7.7.6 in the CAISO's Administrative Pricing tariff amendment, see *Cal. Indep. Sys. Operator Corp.*, 158 FERC ¶ 61,085 (2016)).



Market Disruption Report March 16, 2024 to April 15, 2024

May 15, 2024

CAISO Market Performance and Advanced Analytics

California ISO
250 Outcropping Way
Folsom, California 95630
(916) 351-4400

I. Background

A Market Disruption is an action or event that causes a failure of a CAISO Market, related to system operation issues or System Emergencies.¹ Pursuant to Section 7.7.6 of the CAISO Tariff, the CAISO can take one or more of several specified actions in the event of a Market Disruption, to prevent a Market Disruption, or to minimize the extent of a Market Disruption. The CAISO reports the occurrence of a Market Disruption in the following circumstances:

- When the CAISO market processes fail to publish, including the Integrated Forward Market (IFM), Residual Unit Commitment (RUC), and the Real-Time Market which includes the Hour-Ahead Scheduling Process (HASP), Fifteen Minute Market (FMM), Decoupling of Short-Term Unit Commitment (DSTUC), and Real-Time Dispatch (RTD) processes;
- When the CAISO manually overrides closing the Day-Ahead Market; or
- Any time that the CAISO removes Bids from a CAISO Market to prevent a Market Disruption or to minimize the extent of a Market Disruption.

The Market Disruption report contains the following information:

- The frequency and types of actions taken by the CAISO under Section 7.7.6;
- The nature of the Market Disruptions that caused the CAISO to act, or the Market Disruptions successfully prevented or minimized by the CAISO by taking action, and the CAISO's rationale for taking such actions under Section 7.7.6;
- Information about the Bids (including Self-Schedules) removed under Section 7.7.6 (*i.e.*, megawatt quantity, point of interconnection, specification of the Day-Ahead versus Real-Time Bid, and Energy or Ancillary Services Bid); and
- The CAISO's rationale for its removal of Bids (including Self-Schedules) under Section 7.7.6.²

¹ Section 7.6 and 7.7 of the CAISO Tariff refer to these system operation issues or System Emergencies, respectively. CAISO Tariff, Appendix A, definition of Market Disruption. Capitalized terms not otherwise defined herein have the meanings set forth in the CAISO Tariff.

² *Id.* at P 29 & n.29.

II. Report on Market Disruptions Occurring from March 16, 2024 through April 15, 2024

The CAISO provides a summary of Market Disruptions that occurred from March 16, 2024, through April 15, 2024, in Table 1 and Attachment A below. Attachment A includes an entry for each reportable Market Disruption event and each indicates:

- (1) The date of the Market Disruption;
- (2) The hour and Dispatch Interval when the Market Disruption ended;
- (3) The CAISO Market in which the Market Disruption occurred; and
- (4) A description of the Market Disruption, the nature of any actions taken by the CAISO, the rationale for such actions, and the Market Disruption prevented or minimized because of taking such actions.

For each of the CAISO Markets, Table 1 lists the number of Market Disruptions during the period covered by this report. As shown in Table 1, there were 43 Market Disruptions for the reporting period.

Table 1: Summary of Market Disruption Report

Type of CAISO Market	Market Disruption or Reportable Events
Day-Ahead	
IFM	0
RUC	0
Real-Time	
Fifteen Minute Market Interval 1	1
Fifteen Minute Market Interval 2	1
Fifteen Minute Market Interval 3	0
Fifteen Minute Market Interval 4	2
Real-Time Dispatch	39

The frequency of RTD failures increased from 25 to 39 compared to the report for the period of February 16, 2024, through March 15, 2024. RTD failures accounted for approximately 91 percent of the Market Disruptions during this reporting period.

On April 1, there were seven (two FMM, one HASP, and four RTD interval disruptions due to the implementation of a market software patch. On April 6,

there were five RTD interval disruptions where the previous market interval solution was used. On March 25, there were five RTD interval disruptions where the previous market interval solution was used.

The CAISO made resources non-participating in RTD due to market failures on the following days – March 16, March 21, March 27, April 3, April 4, April 5, April 6, April 7, April 8, and April 9. The resources were made non-participating strictly to resolve the RTD issues and not due to bidding concerns. Different resources were made non-participating for each day.

The CAISO made resources non-participating in FMM due to market failures on the following days – April 4 and April 11. The resources were made non-participating strictly to resolve the FMM issues and not due to bidding concerns. Different resources were made non-participating for each day.

Market Disruption for Unique Pricing Feature

The CAISO implemented a feature to ensure unique pricing under a degenerate condition in November 2015, which the CAISO implemented along with other pricing enhancements to improve market efficiency.

Table 2 captured below shows the dates and markets in which the pricing feature was disabled between March 16, 2024, and April 15, 2024. The CAISO enabled the uniqueness feature for all other intervals across all the markets for the timeframe captured in this report.

Table 2: Status of Unique Pricing Feature across Various Markets

The CAISO did not disable its pricing feature between March 16, 2024, and April 15, 2024, and, therefore, there is no data to populate Table 2.

ATTACHMENT A

**California Independent System Operator Corporation
Market Disruption Report
May 15, 2024**

Table 3: Market Disruptions, Nature of Actions Taken by the CAISO, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
1	3/18/2024	10	8	RTD	RTD results were blocked and previous solution used.
2	3/18/2024	10	9	RTD	RTD results were blocked and previous solution used.
3	3/19/2024	24	4	FMM	FMM did not run due to a network model promotion.
4	3/19/2024	24	11	RTD	RTD did not run due to a network model promotion. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
5	3/19/2024	24	12	RTD	RTD did not run due to a network model promotion. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
6	3/20/2024	5	6	RTD	RTD results were blocked and previous solution used.
7	3/21/2024	13	6	RTD	RTD results were blocked and previous solution used.

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
8	3/22/2024	13	5	RTD	RTD results were blocked and previous solution used.
9	3/22/2024	13	11	RTD	RTD results were blocked and previous solution used.
10	3/23/2024	14	6	RTD	RTD results were blocked and previous solution used.
11	3/23/2024	14	7	RTD	RTD results were blocked and previous solution used.
12	3/24/2024	9	1	RTD	RTD results were blocked and previous solution used.
13	3/24/2024	9	2	RTD	RTD results were blocked and previous solution used.
14	3/24/2024	9	3	RTD	RTD results were blocked and previous solution used.
15	3/25/2024	14	2	RTD	RTD results were blocked and previous solution used.
16	3/25/2024	14	3	RTD	RTD results were blocked and previous solution used.
17	3/25/2024	18	1	RTD	RTD results were blocked and previous solution used.

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
18	3/25/2024	18	2	RTD	RTD results were blocked and previous solution used.
19	3/25/2024	18	3	RTD	RTD results were blocked and previous solution used.
20	3/26/2024	9	7	RTD	RTD results were blocked and previous solution used.
21	3/26/2024	18	6	RTD	RTD results were blocked and previous solution used.
22	4/1/2024	14	4	FMM	FMM did not run due to application of a market software patch.
23	4/1/2024	14	7	RTD	RTD did not run due to application of a market software patch. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
24	4/1/2024	14	8	RTD	RTD did not run due to application of a market software patch. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
25	4/1/2024	14	9	RTD	RTD did not run due to application of a market software patch. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
26	4/1/2024	14	10	RTD	RTD did not run due to application of a market software patch. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
27	4/1/2024	15	1	FMM	FMM did not run due to application of a market software patch.

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
28	4/1/2024	15	2	HASP	HASP did not run due to application of a market software patch.
29	4/2/2024	21	9	RTD	RTD results were blocked and previous solution used.
30	4/4/2024	10	3	RTD	RTD results were blocked and previous solution used.
31	4/5/2024	18	2	RTD	RTD results were blocked and previous solution used.
32	4/6/2024	16	4	RTD	RTD results were blocked and previous solution used.
33	4/6/2024	16	5	RTD	RTD results were blocked and previous solution used.
34	4/6/2024	16	6	RTD	RTD results were blocked and previous solution used.
35	4/6/2024	17	2	RTD	RTD results were blocked and previous solution used.
36	4/6/2024	17	3	RTD	RTD results were blocked and previous solution used.
37	4/7/2024	1	3	RTD	RTD did not run due to running Real-Time Contingency Dispatch (RTCD). The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
38	4/7/2024	1	4	RTD	RTD did not run due to running RTCD. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
39	4/9/2024	8	1	RTD	RTD results were blocked and previous solution used. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
40	4/11/2024	17	7	RTD	RTD results were blocked and previous solution used.
41	4/11/2024	17	9	RTD	RTD results were blocked and previous solution used.
42	4/12/2024	8	4	RTD	RTD results were blocked and previous solution used.
43	4/12/2024	11	1	RTD	RTD results were blocked and previous solution used.
Notes:					
Integrated Forward Market (IFM): The Day-Ahead Market run in which the CAISO conducts the market for purchases and sales of Energy for all hours of the next Trading Day based on submitted supply and demand bids, and procures Ancillary Services.					
Residual Unit Commitment (RUC): The Day-Ahead Market run in which the CAISO conducts unit commitment of additional resources based on submitted availability bids and the forecast of demand for every hour of the next Trading Day.					
Fifteen Minute Market (FMM) Interval 1: The first of four market runs conducted every Trading Hour before the Operating Hour. In this market run, the CAISO conducts the Market Power Mitigation for submitted Bids, which applies to the Real-Time Market processes for the Trading Hour. In this interval the CAISO also procures incremental Ancillary Services from internal resources and dynamic external resources.					
Fifteen Minute Market (FMM) Interval 2: The second of four market runs conducted every Trading Hour before the Operating Hour during which the CAISO conducts the HASP. In the HASP, the CAISO conducts the procurement and sale of Energy and Ancillary services from non-dynamic System Resources based on submitted Bids and the CAISO Forecast of CAISO Demand. In this interval, the CAISO also conducts					

the advisory procurement of incremental Ancillary Services from internal resources and dynamic external resources from T to T+60 minutes and procurement for the Trading Hour.

Fifteen Minute Market (FMM) Interval 3: The third of four market runs conducted every Trading Hour. During this interval, the CAISO commits internal Short-Start and Fast-Start Units for the Time Horizon of T-30 minutes to T+240 minutes. In this interval the CAISO also procures incremental Ancillary Services from internal resources and dynamic external resources for the Trading Hour.

Fifteen Minute Market (FMM) Interval 4: The fourth of four market runs conducted every Trading Hour. This interval is for the Fifteen Minute Market for the T-105 minutes to T+60 minutes time horizon. In this interval, the CAISO also conducts 15-minute Ancillary Service Awards for non-Hourly System Resources, internal resources and dynamic external resources for the Trading Hour.

Real-Time Dispatch (RTD): The five-minute interval of any Operating Hour during which the CAISO conducts the market for Energy based on submitted bids and the CAISO Forecast of CAISO Demand.

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 15th day of May, 2024.

/s/ Ariana Rebancos

Ariana Rebancos