

## NCPA's Comments on the proposed tariff language for the Dispatch Operating Target Clarification Initiative.

NCPA needs clarification from the CAISO on whether the use of the NERC defined term, "Operating Instruction", means verbal communication to the Control Center or both verbal and electronic communication to the Control Center.

If both verbal and electronic communication is the intent, NCPA argues that the CAISO's interpretation of the term "Operating Instruction" conflicts with the NERC definition. As the CAISO states in the Master Definition Supplement of Appendix A, three part communications will be conducted consistent with NERC reliability standard COM-002-4. Standard COM-002-4 requirement R1.2 is copied below:

"Require its operating personnel that issue an oral two-party, person-to-person Operating Instruction to take one of the following actions:

- Confirm the receiver's response if the repeated information is correct.
- Reissue the Operating Instruction if the repeated information is incorrect or if requested by the receiver.
- Take an alternative action if a response is not received or if the Operating Instruction was not understood by the receiver."

Also Section 8.10.8, Rescission of Payments for Ancillary Service Capacity, states the CAISO will "assign that portion of the WECC penalty" for not complying with an Operating Instruction. In order to be assessed the WECC penalty, the use of terms by the CAISO must be consistent with the NERC definitions.

NCPA will be happy to assist with updating the proposed language in the Dispatch Operating Target Clarification Initiative.

Comments to various sections of the tariff are summarized below.

### Section 6.4 Communication of Operating Instructions

"The CAISO shall use normal verbal and **electronic communication** to issue Operating Instructions to the Connected Entity."

The term: Operating Instructions is currently defined under NERC as follows:

"A command by operating personnel responsible for the Real-time operation of the interconnected Bulk Electric System to change or preserve the state, status, output, or input of an Element of the Bulk Electric System or Facility of the Bulk Electric System. (A discussion of general information and of potential options or alternatives to resolve Bulk Electric System operating concerns is not a command and is not considered an Operating Instruction.)"

This implies an Operating Instruction is a verbal operating instruction vs an electronic communication.

### Section 34.13.1 Response Required by Resources to Dispatch Instructions:

Again, using the defined NERC term of Operating Instruction requires a phone call from the CAISO to issue verbal Operating Instructions to have solar resources follow the DOT.

Appendix A Master Definition Supplement

## -“ Operating Instruction

A command by operating personnel responsible for the Real-time operation of the interconnected Bulk Electric System to change or preserve the state, status, output, or input of an Element of the Bulk Electric System or Facility of the Bulk Electric System. **An Operating Instruction will be communicated consistent with three-part communication requirements in NERC Reliability Standard COM-002-4.”**

Three part communications must be conducted verbally over the phone. Therefore, Operating Instructions must be done verbally instead of electronically via ADS.

## “Appendix M Dynamic Scheduling Protocol (DSP)

### **1.5 Operating and Scheduling Requirements**

**1.5.7** Notwithstanding any Dispatches of the System Resource in accordance with the CAISO Tariff, the CAISO shall have the right to **issue Operating Instructions** as defined in the CAISO Tariff to the System Resource either directly or through the Host Balancing Authority Area for emergency or contingency reasons, or to ensure the CAISO’s compliance with operating requirements based on WECC or NERC requirements and policies (e.g., WECC’s Unscheduled Flow Reduction Procedure). However, such Operating Instructions may be issued only within the range of the CAISO-accepted Energy and Ancillary Services, Bids for a given Operating Hour (or the applicable “sub-hour” interval). “

CAISO should clarify whether they plan on issuing Operating Instructions verbally. If not verbally, it’s not an Operating Instruction and therefore, not subject to NERC reliability standard violations and penalties.

Appendix M Section 1.5.8:

**“1.5.8** If there is no Dynamic Schedule in the CAISO’s Day-Ahead Market or RTM, the dynamic signal must be at “zero” (“0”) except when in response to CAISO’s **Dispatch Instructions** associated with accepted Ancillary Services or Energy Bids.”

Per CAISO Tariff definition, Dispatch Instructions can be verbal and electronic. Maybe CAISO should be using the term Dispatch Instructions instead of Operating Instructions in their proposed tariff language changes.

If you have any questions, please contact Dennis Sismaet at 916.781.4225.

Thank you,



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