

**Transmission Induced Generator Outages
White Paper Comments**

Submitted by	Company	Date Submitted
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PG&E appreciates the opportunity to provide comments in response to the CAISO’s White Paper on Transmission Induced Generator Outages.

PG&E supports the direction of the tariff changes to clarify that generation outages due to transmission outages are RAAIM exempt whether the transmission outage is planned or forced; either way the generation outage is outside the generator’s control.

PG&E has the following suggested edits:

- 1) Add Flex to the list of exempted types of Resource Adequacy Capacity;
- 2) Strike the word “Maintenance”;
- 3) Reconsider the specific placement of the language to reduce confusion.

PG&E requests CAISO add Flex to the List of Exempted types of Resource Adequacy Capacity:

There are three types of Resource Adequacy Capacity: local, flex, and system. *Flex* is currently missing from the suggested language, which could lead to a confusing situation where the resulting generation outage¹ is exempt from local and system RA substitutions but still required to substitute for Flex RA. PG&E recommends that the tariff specify all the types of RA such that there is no confusion.

Given the evolving landscape of Resource Adequacy, PG&E would like the CAISO to be mindful that new types of RAs could emerge in the future or that existing ones could evolve.

¹ **Issue Summary:** In PG&E’s view, the crux of the issue is that there are two outage cards created when a transmission outage forces a generator offline. There is the transmission outage and the resulting generation outage. The resulting generation outage has historically only been exempt from Resource Adequacy Availability Incentive Mechanism (RAAIM) when the original transmission outage is in the Forced timeframe. In the planned timeframe, the resulting generation outage is not exempt from RAAIM and therefore is required to substitute. When substitution for the resulting generation outage is not provided, both outages are canceled. The consequence is that the original transmission outage is thus denied for reasons outside the participating transmission owner’s (PTO) immediate control causing major concerns with the PTO’s ability to plan for and perform needed maintenance.

PG&E requests CAISO Strike “Maintenance” for the Proposed Tariff changes:

The presence of the word “Maintenance” could imply that the resulting generation outage would *only* be exempt *if* the resulting outage was a Maintenance Outage—which is specifically defined ([page 105 here](#)). Striking the word “Maintenance” would clarify that the type of generation outage isn’t material as the outage does not exist for any other reason than the transmission outage.

PG&E suggests striking the word “Maintenance” from the proposed tariff edits.

PG&E requests CAISO Reconsider the placement of the text to reduce confusion:

CAISO has suggested the language be placed in §40.9.3.4(d): ***Exclusions from RAAIM for certain Forced Outage types***. This would make sense in the colloquial usage of “forced”² but does not align with the tariff definition³ nor the goal of this initiative of exempting the resulting generation outages when in the Planned Outage timeframe.

Adding to the confusion is the word “Forced”, underlined above for emphasis, does not appear in the CAISO’s redlining of the section of §40.9.3.4(d) in the posted white paper.⁴

PG&E suggests striking the word “Forced” from the title of §40.9.3.4(d) if that is CAISO’s intent. An alternative solution is to move the suggested language to §40.9.3.4(a): ***RA Substitute Capacity Not Required***. It may also be prudent to include the language in both sections if there is any difference between not requiring substitution and being exempt from RAAIM.

Resulting suggested tariff language:

If the CAISO were to adopt all of these suggestions, it would result in the following tariff language:

§40.9.3.4

- (a) **RA Substitute Capacity Not Required.** The RAAIM Availability Assessment for a Resource Adequacy Resource excludes the capacity, duration, and must-offer requirements for Resource Adequacy Capacity on an Outage during the Resource Adequacy month that does not require RA Substitution Capacity under Section 9.3.1.3.3. **The RAAIM Availability Assessment also excludes the capacity, duration, and must-offer requirement for local,**

² As in the literal definition of “forced”: compelled by force or necessity.

³ **Forced Outage:** An Outage for which sufficient notice cannot be given to allow the Outage to be factored into the Day Ahead Market or RTM bidding processes, as defined by the CAISO Tariff.
<http://www.caiso.com/Documents/AppendixA-MasterDefinitionSupplement-asof-Nov15-2018.pdf>

⁴ <http://www.caiso.com/Documents/WhitePaper-TransmissionInducedGeneratorOutages.pdf>



and/or system, and/or flex Resource Adequacy Capacity on an Maintenance Outage caused by a Transmission outage and therefore does not require RA Substitution Capacity.

§40.9.3.4

- (d) **Exclusions from RAAIM for certain Forced Outage types.** The RAAIM Availability Assessment excludes the capacity, duration, and must-offer requirement for local and/or system Resource Adequacy Capacity or Flexible RA Capacity on a Forced Outage in a nature of work category relating to an administrative action by the resource owner, a cause outside of the control of the resource owner, or a short-term use limitation, as those categories are specified in the Business Practice Manual. The RAAIM Availability Assessment also excludes the capacity, duration, and must-offer requirement for local, and/or system, and/or flex Resource Adequacy Capacity on an Maintenance Outage caused by a Transmission outage.

PG&E would like to acknowledge and thank the CAISO for working collaboratively to address ongoing outage management issue.