

RSI Phase 1b and RSI Phase 2 Draft Tariff Language for Feb. 21, 2017 call

(b) A Short-Notice Opportunity RA Outage shall not exceed five days in length. The request for a Short-Notice Opportunity RA Outage must (i) be submitted no more than seven days prior to the requested start date for the outage, (ii) provide the CAISO Outage Coordination Office adequate time to analyze the request before the outage begins, (iii) be submitted before the outage has commenced as a Forced Outage, and (iv) otherwise comply with the requirements of Section 9.

(c) **Approval.**

(1) The CAISO Outage Coordination Office will consider Short-Notice Opportunity RA Outages in the order the requests are received.

(2) If the request was submitted no more than seven days and no less than four days prior to the start date of the outage, the CAISO Outage Coordination Office may approve the request as a Short Notice Opportunity RA Outage if it determines that (i) the outage and the request meet the requirements set forth in Section 9.3.1.3.3.4(b), (ii) system conditions and the overall outage schedule provide an opportunity to take the resource out of service without a detrimental effect on the efficient use and reliable operation of the CAISO Controlled Grid, and (iii) the outage will not result in insufficient available Resource Adequacy Capacity during the outage period. The approved outage will be a Forced Outage **but it will not and will** be subject to the RAIM provisions in Section 40.9.

(3) If the request was submitted three days or less prior to the start date of the outage, the CAISO Outage Coordination Office may approve the request as a Forced Outage if it determines that (i) the outage and request meet the requirements set forth in Section 9.3.1.3.3.4(b), (ii) system conditions and the overall outage schedule provide an opportunity to take the resource out of service without a detrimental effect on the efficient use and reliable operation of the CAISO Controlled Grid, (iii) the outage will not result in insufficient available Resource Adequacy Capacity during the outage period, and (iv) the repairs are necessary to maintain system or resource reliability and require immediate

Comment [b1]: This change is necessary to make this sub-section consistent with the revision to sub-section (a) and the existing language at the end of sub-section (c)(3).

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(a) Each annual Resource Adequacy Plan must be submitted to the CAISO on a schedule and in the reporting format(s) set forth in the Business Practice Manual.

The annual Resource Adequacy Plan must, at a minimum, set forth the Local Capacity Area Resources, if any, procured by the Load Serving Entity as described in Section 40.3, and may identify a Local Capacity Area Resource as Listed Local RA Capacity.

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Comment [b2]: For clarification, is there any requirement to identify any amount of capacity as Listed Local RA Capacity?

(b) Each monthly Resource Adequacy Plan or the same information as required to be included in the monthly Resource Adequacy Plan, plus any other information the CAISO requires as identified in the Business Practice Manual, must be submitted to the CAISO at least 45 days in advance of the first day of the month covered by the plan, and in accordance with the schedule and in the reporting format(s) set forth in the Business Practice Manual. The monthly Resource Adequacy Plan must identify all resources, including Local Capacity Area Resources, the Load Serving Entity will rely upon to satisfy the applicable month's peak hour Demand of the Load Serving Entity as determined by the Demand Forecasts developed in accordance with Section 40.2.2.3 and applicable Reserve Margin. For each Local Capacity Area Resource identified on the monthly Resource Adequacy Plan, the Load Serving Entity also additionally

may identify RA Capacity from such resource as Listed Local RA Capacity. Resource Adequacy Plans must utilize the Net Qualifying Capacity requirements of Section 40.4. A Load Serving Entity is not obligated to provide a monthly Resource Adequacy Plan for any Resource Adequacy product for which it holds a monthly obligation of less than 1 MW.

Comment [b3]: Same question as for sub-section (a) above.

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(c) The Scheduling Coordinator for the Load Serving Entity may submit at any time from 45 days through 44-30 days in advance of the relevant month, a revision to its monthly Resource Adequacy Plan to correct either: (i) a discrepancy between its monthly Resource Adequacy Plan and the monthly Supply Plan of a Resource Adequacy Resource providing that Load Serving Entity with Resource Adequacy

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~~Capacity; or (ii) a deficiency in how much Resource Adequacy Capacity was provided on the monthly Resource Adequacy Plan an error in the plan.~~ -The CAISO will not accept any revisions to a monthly Resource Adequacy Plan from ~~40 days~~30 days in advance of the relevant month through the end of the month, unless the Scheduling Coordinator for the Load Serving Entity demonstrates good cause for the change and explains why it was not possible to submit the change earlier.

- (d) ~~In order to ensure that the CAISO's outage replacement determination remains accurate, the~~ The Scheduling Coordinator for the Load Serving Entity that submits a revision to its monthly Resource Adequacy Plan to correct a deficiency or discrepancy ~~n error~~ must include in the revision a MW amount of Resource Adequacy Capacity for each day of ~~the~~ month that is no less than the MW amount of Resource Adequacy Capacity included in its original plan for each day of the month.

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- (e) ~~In order to ensure that the amount of Resource Adequacy Capacity required to be included in the Load Serving Entity's Resource Adequacy Plan is operationally available to the CAISO throughout the resource adequacy month, the Load Serving Entity that submits the monthly Resource Adequacy Plan is subject to the replacement requirement in Section 9.3.1.3.1.~~

40.3.2 Allocation Of Local Capacity Area Resource Obligations

The CAISO will allocate responsibility for Local Capacity Area Resources to Scheduling Coordinators for Load Serving Entities in the following sequential manner:

- (a) The responsibility for the aggregate Local Capacity Area Resources required for all Local Capacity Areas within each TAC Area as determined by the Local Capacity Technical Study will be allocated to all Scheduling Coordinators for Load Serving Entities that serve Load in the

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TAC Area in accordance with the Load Serving Entity's proportionate share of the LSE's TAC Area Load at the time of the CAISO's annual coincident peak Demand set forth in the annual peak Demand Forecast for the next Resource Adequacy Compliance Year as determined by the California Energy Commission. Expressed as a formula, the allocation of Local Area Capacity Resource obligations will be as follows: $(\sum \text{Local Capacity Area MW in TAC Area from the Local Capacity Technical Study}) * (\text{LSE Demand in TAC Area at CAISO annual coincident peak Demand}) / (\text{Total TAC Area Demand at the time of CAISO annual coincident peak Demand})$. This will result in a MW responsibility for each Load Serving Entity for each TAC Area in which the LSE serves Load. In no instance, however, are Load Serving Entity's Entities obligated to procure Local Capacity Area Resources in a particular TAC Area in excess of the quantity of capacity needed by that Load Serving Entity to meet its applicable Demand and Reserve Margin requirements. If the CAISO determines that a Load Serving Entity would have an obligation to show Local Capacity Area Resources of less than 1 MW in a particular TAC Area, then the Load Serving Entity will have an obligation of zero (0) MWs for that TAC Area in that year. The LSE may meet its MW responsibility, as assigned under this Section, for each TAC Area in which the LSE serves Load by procurement of that MW quantity in any Local Capacity Area in the TAC Area.

- (b) For Scheduling Coordinators for Non-CPUC Load Serving Entities, the Local Capacity Area Resource obligation will be allocated based on Section 40.3.2(a) above.
- (c) For Scheduling Coordinators for CPUC Load Serving Entities, the CAISO will allocate the Local Capacity Area Resource obligation based on an allocation methodology, if any, adopted by the CPUC. However, if the

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allocation methodology adopted by the CPUC does not fully allocate the total sum of each CPUC Load Serving Entity's proportionate share calculated under Section 40.3.2(a), the CAISO will allocate the difference to all Scheduling Coordinators for CPUC Load Serving Entities in accordance with their proportionate share calculated under 40.3.2(a). If the CPUC does not adopt an allocation methodology, the CAISO will allocate Local Capacity Area Resources to Scheduling Coordinators for CPUC Load Serving Entities based on Section 40.3.2(a).

Once the CAISO has allocated the total responsibility for Local Capacity Area Resources, the CAISO will inform the Scheduling Coordinator for each LSE of the LSE's specific allocated responsibility for Local Capacity Area Resources in each TAC Area in which the LSE serves Load.

40.4.7 Submission Of Supply Plans

40.4.7.1 Schedule for Submission of Supply Plans

Scheduling Coordinators representing Resource Adequacy Resources supplying Resource Adequacy Capacity shall provide the CAISO with annual and monthly Supply Plans, as follows:

- (a) The annual Supply Plan shall be submitted to the CAISO on the schedule set forth in the Business Practice Manual and shall verify their agreement to provide Resource Adequacy Capacity during the next Resource Adequacy Compliance Year. The annual Supply Plan may identify a Local Capacity Area Resource as Listed Local RA Capacity.
- (b) The monthly Supply Plans or the same information as required to be included in the monthly Supply Plan, plus any other information the CAISO requires as identified in the Business Practice Manual, shall be submitted to the CAISO at least 45 days in advance of the first day of the month covered by the plan, and in accordance with the schedule and in the reporting format(s) set forth in the

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Comment [b4]: Same question as for Section 40.2.2.4(a) and (b) above.

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Business Practice Manual, and shall verify their agreement to provide Resource Adequacy Capacity during that resource adequacy month. The monthly Supply Plan may identify a Local Capacity Area Resource as Listed Local RA Capacity

- (c) The Scheduling Coordinator for the Resource Adequacy Resource may submit, at any time from 45 days through ~~44~~30 days in advance of the relevant month, a revision to its monthly Supply Plan to correct ~~an error in the plan, a discrepancy between its monthly Supply Plan and a Resource Adequacy Plan of a Load Serving Entity for which that Resource Adequacy Resource is providing Resource Adequacy Capacity.~~ The CAISO will not accept any revisions to a monthly Supply Plan from ~~40~~30 days in advance of the relevant month through the end of the month, unless the Scheduling Coordinator for the Resource Adequacy Resource demonstrates good cause for the change and explains why it was not possible to submit the change earlier.

- ~~(d) The monthly Supply Plan may indicate the willingness of the resource to offer capacity for procurement as backstop capacity under the Capacity Procurement Mechanism pursuant to Section 43, and provide the identity of the resource, the available capacity amount, the time periods when the capacity is available, and other information as may be specified in the Business Practice Manual.~~

Comment [b5]: Same question as for sub-section (a) above)

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40.7 Compliance

The CAISO will evaluate Resource Adequacy Plans and Supply Plans as follows:

- (a) The CAISO will evaluate whether each annual and monthly Resource Adequacy Plan submitted by a Scheduling Coordinator on behalf of a Load Serving Entity demonstrates Resource Adequacy Capacity sufficient to satisfy the Load Serving Entity's (i) allocated responsibility for Local Capacity Area Resources under Section 40.3.2 and (ii) applicable Demand and Reserve Margin requirements. Any evaluation of compliance with the responsibility for procuring Local Capacity

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Area Resources will be made without regard to capacity's identification as Listed

Local RA Capacity. If the CAISO determines that a Resource Adequacy Plan does not demonstrate Local Capacity Area Resources sufficient to meet its allocated responsibility under Section 40.3.2, compliance with applicable Demand and Reserve Margin requirements, or compliance with any other resource adequacy requirement in this Section 40 or adopted by the CPUC, Local Regulatory Authority, or federal agency, as applicable, the CAISO will notify the relevant Scheduling Coordinator, CPUC, Local Regulatory Authority, or federal agency with jurisdiction over the relevant Load Serving Entity, or in the case of a mismatch-discrepancy between Resource Adequacy Plan(s) and Supply Plan(s), the relevant Scheduling Coordinators, in an attempt to resolve any deficiency in accordance with the procedures set forth in the Business Practice Manual. The notification will be made at least 25-40 days in advance of the first day of the month covered by the plan and will include the reasons the CAISO believes a deficiency exists. If the deficiency relates to the demonstration of Local Capacity Area Resources in a Load Serving Entity's annual Resource Adequacy Plan, and the CAISO does not provide a written notice of resolution of the deficiency as set forth in the Business Practice Manual, the Scheduling Coordinator for the Load Serving Entity may demonstrate that the identified deficiency is cured by submitting a revised annual Resource Adequacy Plan within thirty (30) days of the beginning of the Resource Adequacy Compliance Year. For all other identified deficiencies, at least ~~ten (10)~~30 days prior  the effective month of the relevant Resource Adequacy Plan, the Scheduling Coordinator for the Load Serving Entity shall (i) demonstrate that the identified deficiency is cured by submitting a revised Resource Adequacy Plan or (ii) advise the CAISO that the CPUC, Local Regulatory Authority, or federal agency, as appropriate, has determined that no deficiency exists.

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If the CAISO determines that it will have sufficient operationally available RA Capacity to meet or exceed the CAISO system RA Reliability Margin for a particular day, then no supplier with an outage submitted at least 25 days before the start of the month would be required to provide RA Substitute Capacity **other than RA Substitute Capacity previously designated** to be excluded from the RAAIM calculation as part of the analysis conducted no later than 22 days before the start of each month.

If the CAISO determines that it will not have sufficient operationally available RA capacity to meet the CAISO system RA Reliability Margin for a particular day, then it will determine which resources must provide RA Substitute Capacity to be excluded from the RAAIM calculation **based on the reverse order of the dates on which the resources submitted the outage requests to the CAISO. The CAISO will first request the resource providing RA Capacity with the most-recently-requested outage for that day to provide RA Substitute Capacity and then will continue to assign substitution obligations until the CAISO has sufficient operationally available RA Capacity to meet the CAISO system RA Reliability Margin for that particular day, assuming that all resources that are assigned a RA Substitute Capacity obligation actually provide RA Substitute Capacity for that day.**

For purposes of this section 40.9.3.6.1, **the CAISO will treat** any request to extend the scheduled duration of an outage or increases the MW amount of capacity on outage as a new outage request and **will** assign a new priority date based on when the request to change the outage or derate was submitted to the CAISO.

A resource **designated to provide** RA Substitute Capacity as part of the analysis conducted no later than 22 days before the start of each month **must** provide it no later than eight days before the start of the month. Failure to **designate** the RA Substitute Capacity by eight days before the start of the month will subject the resource to RAAIM unless the outage is cancelled or rescheduled.

40.9.3.6.2 CAISO Evaluation of Need for Substitute Capacity at T-8

No later than eight days before the start of each month, the CAISO **will** determine for each day in that month whether the CAISO will have sufficient operationally available RA Capacity from a

Comment [b6]: Since the assessment considers RA Substitute Capacity already provided for the month, it should be clear that suppliers remain obligated to provide that previously designated RA Substitute Capacity.

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combination of Local Capacity Area Resources and system capacity resources to meet or exceed the CAISO system RA Reliability Margin for each day. The CAISO will base this assessment on outages planned to be taken during the month that were submitted at least eight days before the start of the month and any RA Substitute Capacity already provided to the CAISO for that month. If the CAISO determines that it will have sufficient operationally available RA Capacity to meet or exceed the CAISO system RA Reliability Margin for a particular day, then no supplier with an outage submitted at least eight days before the start of the month will be required to provide RA Substitute Capacity (other than RA Substitute Capacity previously designated) to be excluded from the RAAIM calculation as part of the analysis conducted no later than eight days before the start of each month.

If the CAISO determines that it will not have sufficient operationally available RA capacity to meet the CAISO system RA Reliability Margin for a particular day, then it will determine which resources must provide RA Substitute Capacity to be excluded from the RAAIM calculation based on the reverse order of the dates on which the outage requests were submitted to the CAISO. The CAISO will first request the resource providing RA Capacity with the most-recently-requested outage for that day to provide RA Substitute Capacity and then will continue to assign substitution obligations until the CAISO has sufficient operationally available RA Capacity to meet the CAISO system RA Reliability Margin for that particular day, assuming that all resources that are assigned a RA Substitute Capacity obligation actually provide RA Substitute Capacity for that day. For the purposes of this section 40.9.3.6.2, the CAISO will treat any request to extend the scheduled duration of the outage or increase the MW amount of capacity on outage as a new outage request and will assign a new priority date based on when the request to change the outage or derate was submitted to the CAISO.

A resource designated to provide RA Substitute Capacity as part of the analysis conducted no later than eight days before the start of each month will provide RA Substitute Capacity by the deadline specified in the relevant Business Practice Manual. Failure to designate the RA Substitute Capacity by the specified deadline will subject the resource to RAAIM unless the outage is cancelled or rescheduled.

Comment [b7]: Since the assessment considers RA Substitute Capacity already provided for the month, it should be clear that suppliers remain obligated to provide that previously designated RA Substitute Capacity.

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(2) **Approval.** The CAISO will grant the request if the alternate resource has adequate deliverable capacity to provide the RA Substitute Capacity and meets the requirements in Sections 40.9.3.6.15(c)(1) and 40.9.3.6.4(b).

(d) **External Resources**

(1) **Request.** To use a Dynamic System Resource, Non-Dynamic System Resource, NRS-RA Resource, or Pseudo-Tie as RA Substitute Capacity, the Scheduling Coordinator for a Resource Adequacy Resource that has an Outage ~~a Forced Outage or de-rate~~ must submit a timely substitution request in the Day-Ahead Market in accordance with Section 40.9.3.6.4(c).

(2) **Approval.** The CAISO will grant the request if the alternate resource is external to the CAISO Balancing Authority Area (including Pseudo-Ties), the Scheduling Coordinator for the resource has an adequate available import allocation at the resource's Scheduling Point to provide the RA Substitute Capacity, and meets the requirements in Sections 40.9.3.6.15(d)(1) and 40.9.3.6.4(b).

(e) **Flexible RA Capacity**

(1) **Request.** To use a resource as RA Substitute Capacity, the Scheduling Coordinator for the Flexible RA Resource that has a Forced Outage or de-rate must submit a timely substitution request in the Day-Ahead Market or Real-Time Market in accordance with Section 40.9.3.6.4(c) and specify the MW of RA Substitute Capacity to be provided, which may not exceed the MWs of the outage.

(2) **Approval.** The CAISO will grant the request if the alternate resource has adequate deliverable capacity to provide the RA Substitute Capacity, meets the applicable requirements in Sections 40.9.3.6.15(e) and 40.9.3.6.4(b), and is capable of meeting the must-offer obligation in Section 40.10.6 applicable to the highest quality Flexible Capacity Category for the MWs of the Flexible RA Capacity commitments of the resource on outage and the alternate resource.

Comment [b8]: Is substitution only available for Flexible RA Capacity for Forced Outages?

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40.9.3.6.2-6 RA Substitute Capacity From Multiple Resources

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Scheduling Coordinator for a Resource Adequacy Resource that has a ~~Forced Outage or de-rate~~ n Outage must submit a timely substitution request in the Day-Ahead Market in accordance with Section 40.9.3.6.4(c).

- (2) **Approval.** The CAISO will grant the request if the alternate resources are external to the CAISO Balancing Authority Area (including Pseudo-Ties), and the Scheduling Coordinator of each alternate resource has an adequate available import allocation at the resource's Scheduling Point to provide the RA Substitute Capacity, and meet the requirements in Sections 40.9.3.6.6e(d)(1) and 40.9.3.6.4(b).

(e) **Flexible RA Capacity**

- (1) **Request.** To use RA Substitute Capacity from multiple resources, the Scheduling Coordinator for a resource providing Flexible RA Capacity on a ~~Forced Outage or de-rate~~ must submit a timely substitution request in the Day-Ahead Market or the Real-Time Market **and the alternate resources must be located in the CAISO Balancing Authority Area, which does not include a Pseudo-Tie of a Generating Unit or a Resource-Specific System Resource.**

- (2) **Approval.** The CAISO will grant the request if the alternate resources meet the requirements in Sections 40.9.3.6.26(d)(1) and 40.9.3.6.4(c).

40.9.3.6.37 Multiple Substitution by One Resource. The Scheduling Coordinator for a resource already providing RA Substitute Capacity may provide RA Substitute Capacity for one or more additional Resource Adequacy Resources on a ~~Forced Outage or de-rate~~ Outage, subject to approval by the CAISO pursuant to Section 40.9.3.6.4-5 or 40.9.3.6.26.

40.9.3.6.4-8 Resource Adequacy Obligation. To the extent a resource provides RA Substitute Capacity, the resource must meet and comply with all requirements in Section 40 applicable to RA Substitute Capacity for the duration of the substitution; except that RA Substitute Capacity shall be released from this obligation and the substitution requirements in Section 40.9 –

- (a) at the end of the approved substitution period; or

Comment [b9]: Is substitution only available for Flexible RA Capacity for Forced Outages?

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Comment [b10]: Why is this restriction included in this section but not in Section 40.9.3.6.5(e)? The restriction does not make sense when Pseudo-Tie resources and Dynamic Scheduled resources are eligible to provide Flexible RA Capacity under Section 40.10.3.6.

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Listed Local RA Capacity

The capacity of Local Capacity Area Resources that, subject to resolution of a potential discrepancy as provided in Section 40.7(b), is identified on a Load Serving Entity's Resource Adequacy Plan and a supplier's corresponding Supply Plan as being obligated (for the purposes of sections 40.9.3.6.5 and 40.9.3.6.6) to provide RA Substitute Capacity from the same Local Capacity Area.

Off-Peak Opportunity RA Maintenance Outage

A Maintenance Outage at a Resource Adequacy Resource that is approved by the CAISO Outage Coordination Office to be initiated and completed during off-peak hours (as specified in the Business Practice Manual) without RA Replacement Substitute Capacity for the Resource Adequacy Capacity on ~~the o~~Outage or de-rate.

RA Maintenance Outage With ReplacementSubstitution

A Maintenance Outage, or change to an Approved Maintenance Outage, at a Resource Adequacy Resource that the CAISO Outage Coordination Office receives ~~no more than forty-five days prior to the first day of the resource adequacy month for which the outage is requested and~~ no less than eight days prior to the start of the outage and that includes RA Replacement Substitute Capacity for the Resource Adequacy Capacity on ~~the o~~Outage or de-rate.

RA Maintenance Outage Without ReplacementSubstitution

A Maintenance Outage, or change to an Approved Maintenance Outage at a Resource Adequacy Resource that the CAISO Outage Coordination Office receives ~~no more than forty-five days prior to the first day of the resource adequacy month for which the outage is requested and~~ no less than eight days prior to the start of the outage without RA Replacement Substitute Capacity for the Resource Adequacy Capacity on ~~the o~~Outage or de-rate.

Comment [b11]: For consistency with previous usage.
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Comment [b12]: For consistency with previous usage.
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Comment [b13]: For consistency with previous usage.
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RA Replacement Capacity

~~Specified RA Replacement Capacity, Non-Specified RA Replacement Capacity, or capacity that is not Resource Adequacy Capacity, CPM Capacity, or capacity under an RMR contract, that replaces Resource Adequacy Capacity that is not operationally available to the CAISO due to a Maintenance Outage, an RA Maintenance Outage With Replacement or a Forced Outage approved under Section 9.3.1.3.3.1(c)(4).~~

RA Substitute Capacity

Capacity that the CAISO permits under the CAISO Tariff substitutes to be substituted for a Resource Adequacy Resource that is on a Forced Outage or de-rate.

Short-Notice Opportunity RA Maintenance Outage

~~Forced Outage at a Resource Adequacy Resource accommodated by the CAISO on short notice without RA Replacement Capacity or RA Substitute Capacity for the Resource Adequacy Capacity on the oOutage or de-rate,~~

Specified RA Replacement Capacity

~~RA Replacement Capacity specified by the Load-Serving Entity to replace specific Resource Adequacy Capacity included in its monthly Resource Adequacy Plan, for all or a portion of the period that the Resource Adequacy Capacity will not be operationally available to the CAISO during the month due to an Approved Maintenance Outage.~~

System Total Available RA Capacity

~~The system total Resource Adequacy Capacity provided in the Resource Adequacy Plans, including the total MW of Specified RA Replacement Capacity accepted by the CAISO, less the total MW of unreplaced capacity in the Resource Adequacy Plans that is scheduled to take an Approved Maintenance Outage during the month.~~

Comment [b14]: For consistency with previous usage.

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