March 19, 2020

STAKEHOLDER BRIEF ON BEHALF OF
THE CITIES OF ANAHEIM, AZUSA, BANNING, COLTON,
PASADENA, AND RIVERSIDE, CALIFORNIA
IN SUPPORT OF APPEAL OF PROPOSED REVISION REQUEST 1139

Through PRR 1139, “Updates to nature of work attributes for generation outages & outage reporting section,” the CAISO revised the BPM for Outage Management to remove the ability to use the “Ambient Not Due to Temp” nature of work outage card for “[n]on-temperature related unit availability derate that is outside the control of the plant operator.” By doing so, the CAISO limited the use of this outage card to only apply “exclusively for gas-fired units that face limitations because of gas system curtailments.” PRR 1139 creates a substantive change to the Ambient Not Due To Temp nature of work that is inconsistent with the CAISO Tariff. The Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (the “Six Cities”) support Southern California Edison Company’s (“SCE”) appeal of PRR 1139 and urge the Appeals Committee to reject PRR 1139.

The CAISO’s revision to the Ambient Not Due To Temp nature of work is a policy change not based in the Tariff that inappropriately limits the availability of this outage card. As described by SCE, the CAISO’s change runs counter to Tariff Section 40.9.3.4(d), Exclusions from RAAIM for certain Forced Outage types. Section 40.9.3.4(d) allows for exclusions from the Resource Adequacy Availability Incentive Mechanism (“RAAIM”) for nature of work categories “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.” The CAISO’s proposal – to limit

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1 CAISO Reply Brief at 1.
2 SCE Reply Brief at 2-3.
the Ambient Not Due To Temp outage card to only gas-fired units with fuel limitations –
inappropriately narrows the scope of nature of work categories that are due to “a cause outside of
the control of the resource owner.” By limiting the application of Section 40.9.3.4(d) to apply
only to gas-fired units, the CAISO has removed the ability of hydro units to use the outage card
for a “non-temperature related unit availability derate that is outside the control of the plant
operator” without providing a reasoned basis for this policy change. The CAISO’s revision is
substantive in nature and limits the ability of hydro units that could previously use this outage
card to manage physical limitations. The CAISO acknowledges that “[t]he Ambient Not Due to
Temp outages are exempt under this tariff provision because they are beyond the resource’s
control,” but does not recognize that a hydro resource’s water limitations are exactly that –
beyond the generator’s control, much like fuel limitations for gas-fired units. The CAISO has
provided no valid reason for reinterpreting its Tariff to limit its application to only one type of
resource.

The CAISO argues that history supports its claim that the Ambient Not Due to Temp
outage card is only for gas system constraints, when history actually shows the opposite.3 The
CAISO’s timeline of revisions to the Ambient Not Due to Temp nature of work shows that it
originally “was defined solely as: ‘Non-temperature related unit availability derate that is outside
the control of the plant operator’”4 – the exact language the CAISO now seeks to remove.
Approximately three years after the Ambient Not Due to Temp outage card was included in the
Outage Management BPM, the CAISO added additional language to address gas system
constraints. Three years after that, the CAISO proposed, through PRR 1139, to remove the

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3 See CAISO Reply Brief at 8-9.

4 Id. at Attachment A.
initial language completely, thus removing the language that defined the nature of work in the first instance, writing the initial intent of the nature of work attribute completely out of its definition.

The CAISO’s claim that the Ambient Not Due to Temp nature of work is solely for gas system constrains is also undermined by recent revisions adopted through PRR 1168, “Outage card clarification for resources and must offer obligation clarification for conditionally available resource and other resources under Tariff section 40.6.4.1.” PRR 1168 specified that the nature of work applied to gas-related limitations and resources subject to the Tariff Section 40.6.4.1 Must-Offer Obligation, including “Hydro Units without qualifying use limits, Pumping Load without qualifying use limits, Non-Dispatchable Resources without qualifying use limits, and Conditionally-Available Resources.” By making this revision, the CAISO made clear that the Ambient Not Due to Temp nature of work does not, and was not intended to, apply only to gas-related limitations, but may be used for other resources where consistent with Section 40.9.3.4(d) of the CAISO Tariff.

Because PRR 1139 involves a policy change that is not supported by the Tariff and is inconsistent with the historical and practical use of the Ambient Not Due To Temp outage card, the Six Cities respectfully request that Appeals Committee grant SCE’s appeal and reject PRR 1139.
Submitted by,

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