

Comments of Calpine Corporation on

2020 Local Capacity Area Technical Study

Draft

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Summary:

Calpine offers comments on only one aspect of the Draft LCR Study Manual, the list of enforced contingencies.

As similarly suggested in the RA Enhancements scoping process, Calpine suggests that the scope be revised to ensure that the Local Capacity Technical studies address the same set of contingencies as those required under the revised NERC Transmission Planning (including TPL-001-4) standards. The CAISO Tariff explicitly and affirmatively requires in Section 40.3.1.1 that the CAISO include all identified NERC contingencies:

In performing the Local Capacity Technical Study, the CAISO will apply those methods for resolving Contingencies considered appropriate for the performance level that corresponds to a particular studied Contingency, as provided in NERC Reliability Standards TPL-001-0, TPL-002-0, TPL-003-0, and TPL-004-0, as augmented by CAISO Reliability Criteria in accordance with the Transmission Control Agreement and Section 24.2.1.

However, in the scope documents of the Local Capacity Technical studies, the CAISO limits the list of contingencies to a subset¹ of those required by NERC. Specifically, Table 1 of the 2020 Local Capacity Technical study, excludes contingencies such as bus section faults, breaker failures, sequential transformer outages, stuck breaker conditions and credible extreme events.

The presentation materials of October 31 (slide 31) highlight the risk of limiting the consideration of credible contingencies:

Limiting the number of contingencies (e.g., boundary elements) would contradict with real time operations where the ISO needs to maintain system reliability for all possible contingencies.

As supply and demand tighten in these local areas, the CAISO must include all of these contingencies in the analysis of local area reliability. It should modify the scope of this LCR Study to evaluate all credible TPL contingencies.

Thanks

¹ See Table 1 of the 2020 Local Capacity Requirements Draft Study Manual study at: <http://www.caiso.com/Documents/2020LocalCapacityRequirementsDraftStudyManual.pdf>