

December 15, 2009

The Honorable Kimberly D. Bose Secretary Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426

Re: California Independent System Operator Corporation Docket Nos. ER06-615-___ and ER07-1257-___ Market Disruption Report

Dear Secretary Bose:

The California Independent System Operator Corporation (ISO) hereby submits its December report covering Market Disruptions reportable events under Section 7.7.15 of its FERC Electric Tariff (ISO Tariff) that occurred from October 16 to November 15, 2009.¹

Please contact the undersigned with any questions.

Respectfully submitted,

<u>/s/ Anna McKenna</u>

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The ISO submits the Market Disruption report pursuant to *California Independent System Operator Corp.*, 126 FERC ¶ 61,211 (2009), and Section 7.7.15.4 of the ISO Tariff.



Market Disruption Report October 16 to November 15, 2009

December 15, 2009

I. Background

A Market Disruption is an action or event that causes a failure of a CAISO Market, related to system operation issues or System Emergencies. Pursuant to Section 7.7.15 of the CAISO Tariff, the California Independent System Operator Corporation (ISO or CAISO) can take one or more of a number of specified actions in the event of a Market Disruption, to prevent a Market Disruption, or to minimize the extent of a Market Disruption. The ISO interprets this to mean that a Market Disruption occurs and the ISO is obligated to report its occurrence in any of the following circumstances:

- When any of the ISO market processes fail to publish, including the Integrated Forward Market ("IFM"), Residual Unit Commitment ("RUC"), Hour-Ahead Scheduling Process ("HASP"), Real-Time Pre-Dispatch ("RTPD"), or Real-Time Dispatch ("RTD") processes;
- When the ISO manually overrides the closing of the Day-Ahead Market; or
- Any time that the ISO removes Bids from a CAISO Market to prevent a Market Disruption or to minimize the extent of a Market Disruption.

The Market Disruption report contains the following information:

- The frequency and types of actions taken by the ISO pursuant to Section 7.7.15;
- The nature of the Market Disruptions that caused the ISO to take action, or the Market Disruptions that were successfully prevented or minimized by the ISO as a result of taking action, and the ISO's rationale for taking such actions pursuant to Section 7.7.15;
- Information about the Bids (including Self-Schedules) removed pursuant to Section 7.7.15 (i.e. megawatt quantity, point of interconnection, specification of the Day-Ahead versus Real-Time Bid, and Energy or Ancillary Services Bid); and
- The ISO's rationale for its removal of Bids (including Self-Schedules) pursuant to Section 7.7.15.²

Id. at P 29 & n.29.

These system operation issues or System Emergencies are referred to in Sections 7.6 and 7.7, respectively, of the CAISO Tariff. CAISO Tariff, Appendix A, definition of Market Disruption. Capitalized terms not otherwise defined herein have the meanings set forth in the CAISO Tariff.

II. Report on Market Disruptions Occurring from October 16 through November 15, 2009

The ISO's report on Market Disruptions that occurred during the time period from October 16 through November 15, 2009, is provided in Table 1 and Attachment A, below. Attachment A includes an entry for each reportable Market Disruption event and each entry also indicates:

- (1) The date of the Market Disruption;
- (2) The hour and Dispatch Interval when the Market Disruption ended;
- (3) The type of CAISO Market in which the Market Disruption occurred; and
- (4) A description of the nature of the Market Disruption, the nature of any actions taken by the ISO, the rationale for such actions, and the Market Disruption prevented or minimized as a result of taking such actions.

For each of the CAISO Markets, Table 1 lists the number of Market Disruptions and the number of times that the ISO removed Bids (including Self-Schedules) during the time period covered by this report. As shown in Table 1, there were a total of 36 Market Disruptions for the reporting period, increasing by 19 compared with the November 2009 report. Table 1 also indicates that no reportable events occurred in the Day-Ahead Market (IFM or RUC) and that the ISO did not remove any Bids (including Self-Schedules) during the reporting period.

Table 1 and Attachment A indicate that there were 29 total instances of RTPD failures, including 6 HASP failures. The count of RTPD failures increased by 20 and the count of HASP failures increased by 3 compared with the November 2009 Report. Most of the RTPD failures (including HASP failures) were due to broadcast failure, timing out, new database deployment, or data issue. The number of RTD failures declined by 1 from 8 such instances reported in the November 2009 Report. The RTD failures accounted for approximately 20 percent of all of the Market Disruptions during this reporting period. Most of the RTD failures were due to data issue or new database deployment.

On November 3, there were a total of 6 RTD and RTPD failures (including 1 HASP failure) in hour ending 1. This is caused by the deployment of the new database (DB 43) in real-time market. On November 12, a new intertie constraint was introduced into the market and this resulted in a total of 6 RTD and RTPD failures in hours ending 21 and 22 during the transition period. The market failures caused by these two events accounted for approximately 33 percent of total Market Disruptions during this reporting period.

Table 1: Summary of Market Disruption Report

Type of CAISO Market	Market Disruption or Reportable Events	Removal of Bids (including Self-Schedules)
Day-Ahead		
IFM	0	0
RUC	0	0
Real-Time		
Real-Time Pre-Dispatch Interval 1	1	0
Real-Time Pre-Dispatch Interval 2	6	0
Real-Time Pre-Dispatch Interval 3	21	0
Real-Time Pre-Dispatch Interval 4	1	0
Real-Time Dispatch	7	0

ATTACHMENT A

California Independent System Operator Corporation Market Disruption Report December 15, 2009

Table 1: Market Disruptions, Nature of Actions Taken by the California ISO, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
1	10/16/2009	3	3	RTPD	Broadcast of RTPD results failed. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.
2	10/16/2009	4	3	RTPD	RTPD timed out. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.
3	10/19/2009	4	3	RTPD	RTPD timed out. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.
4	10/22/2009	12	2	HASP	HASP timed out. Market Disruption was limited to one interval. ISO issued a notice through the Market Notification System instructing resources to follow Day-Ahead Schedules and Awards for interties. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval. Any incremental or decremental Real-Time Energy at the interties beyond the Day-Ahead Schedules that was not dispatched by the ISO is treated as an Operational Adjustment (Tier 2) for Settlement purposes.
5	10/24/2009	16	11	RTD	Broadcast of RTD results failed. Loss clearing payload and LMP filled from last good interval.
6	10/25/2009	21	3	RTPD	Broadcast of RTPD results failed. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
7	10/28/2009	7	2	HASP	Broadcast of HASP results failed. Market Disruption was limited to one interval. ISO issued a notice through the Market Notification System instructing resources to follow Day-Ahead Schedules and Awards for interties. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval. Any incremental or decremental Real-Time Energy at the interties beyond the Day-Ahead Schedules that was not dispatched by the ISO is treated as an Operational Adjustment (Tier 2) for Settlement purposes.
8	10/30/2009	22	3	RTPD	RTPD did not run. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.
9	10/31/2009	20	3	RTPD	RTPD did not run. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.
10	11/2/2009	9	3	RTPD	RTPD did not run due to missing bids. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.
11	11/3/2009	1	1	RTPD	RTPD did not run due to new database deployment. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.
12	11/3/2009	1	2	HASP	HASP did not run due to new database deployment. ISO issued a notice through the Market Notification System instructing resources to follow Day-Ahead Schedules and Awards for interties. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval. Any incremental or decremental Real-Time Energy at the interties beyond the Day-Ahead Schedules that was not dispatched by the ISO is treated as an Operational Adjustment (Tier 2) for Settlement purposes.
13	11/3/2009	1	3	RTD	RTD did not run due to new database deployment. Loss clearing payload and LMP filled from last good interval.
14	11/3/2009	1	3	RTPD	RTPD failed due to new database deployment. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
15	11/3/2009	1	4	RTD	RTD did not run due to new database deployment. Loss clearing payload and LMP filled from last good interval.
16	11/3/2009	1	5	RTD	RTD did not run due to new database deployment. Loss clearing payload and LMP filled from last good interval.
17	11/8/2009	7	4	RTPD	RTPD did not run. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.
18	11/10/2009	21	3	RTPD	RTPD did not run. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.
19	11/11/2009	21	2	HASP	HASP timed out. ISO issued a notice through the Market Notification System instructing resources to follow Day-Ahead Schedules and Awards for interties. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval. Any incremental or decremental Real-Time Energy at the interties beyond the Day-Ahead Schedules that was not dispatched by the ISO is treated as an Operational Adjustment (Tier 2) for Settlement purposes.
20	11/11/2009	21	3	RTPD	RTPD failed. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.
21	11/11/2009	22	2	HASP	HASP timed out. ISO issued a notice through the Market Notification System instructing resources to follow Day-Ahead Schedules and Awards for interties. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval. Any incremental or decremental Real-Time Energy at the interties beyond the Day-Ahead Schedules that was not dispatched by the ISO is treated as an Operational Adjustment (Tier 2) for Settlement purposes.
22	11/12/2009	21	3	RTPD	RTPD failed due to data issue. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.
23	11/12/2009	21	9	RTD	RTD did not run due to data issue. Loss clearing payload and LMP filled from last good interval.

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
24	11/12/2009	22	3	RTD	RTD did not run due to data issue. Loss clearing payload and LMP filled from last good interval.
25	11/12/2009	22	3	RTPD	RTPD timed out due to data issue. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.
26	11/12/2009	22	4	RTD	RTD did not run due to data issue. Loss clearing payload and LMP filled from last good interval.
27	11/12/2009	23	3	RTPD	RTPD timed out due to data issue. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.
28	11/13/2009	7	3	RTPD	RTPD timed out due to solution taking more time than usual. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.
29	11/13/2009	8	3	RTPD	RTPD timed out due to solution taking more time than usual. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.
30	11/14/2009	6	3	RTPD	RTPD timed out. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.
31	11/14/2009	16	2	HASP	HASP timed out because the complexity of the market resulted in longer run time than usual. ISO issued a notice through the Market Notification System instructing resources to follow Day-Ahead Schedules and Awards for interties. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval. Any incremental or decremental Real-Time Energy at the interties beyond the Day-Ahead Schedules that was not dispatched by the ISO is treated as an Operational Adjustment (Tier 2) for Settlement purposes.
32	11/14/2009	16	3	RTPD	RTPD timed out because the complexity of the market resulted in longer run time than usual. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
33	11/14/2009	19	3	RTPD	RTPD failed. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.
34	11/14/2009	23	3	RTPD	RTPD timed out. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.
35	11/15/2009	1	3	RTPD	RTPD timed out. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.
36	11/15/2009	23	3	RTPD	RTPD timed out. This interval was filled either automatically or interactively. MQS published PNode clearing and resource awards for this interval.

Notes:

Integrated Forward Market (IFM): The Day-Ahead Market run in which the ISO conducts the market for purchases and sales of Energy for all hours of the next Trading Day based on submitted supply and demand bids, and performs the procurement of Ancillary Services.

Residual Unit Commitment (RUC): The Day-Ahead Market run in which the ISO conducts unit commitment of additional resources based on submitted availability bids and the forecast of demand for every hour of the next Trading Day.

Real-Time Pre-Dispatch (RTPD) Interval 1: The first of a series of four market runs conducted every Trading Hour in advance of the Operating Hour. In this run the ISO conducts the Market Power Mitigation and Reliability Requirement Determination for submitted Bids, which applies to all of the Real-Time Market processes for the given Trading Hour. In this interval the ISO also conducts the procurement of incremental Ancillary Services from internal resources and dynamic external resources.

Real-Time Pre-Dispatch (RTPD) Interval 2: The second of a series of four market runs conducted every Trading Hour in advance of the Operating Hour during which the ISO conducts the HASP. In the HASP, the ISO conducts the procurement and sale of Energy and Ancillary services from non-dynamic System Resources based on submitted Bids and the CAISO Forecast of CAISO Demand. In this interval the ISO also conducts the advisory procurement of incremental Ancillary Services from internal resources and dynamic external resources from T to T+60 minutes and procurement for the given Trading Hour.

Real-Time Pre-Dispatch (RTPD) Interval 3: The third of a series of four market runs conducted every Trading Hour. During this interval the ISO conducts the commitment of internal Short-Start and Fast Start Units for the Time Horizon of T-30 minutes to T+240 minutes. In this interval the ISO also conducts the procurement of incremental Ancillary Services from internal resources and dynamic external resources for the given Trading Hour.

Real-Time Pre-Dispatch (RTPD) Interval 4: The fourth of a series of four market runs conducted every Trading Hour. This interval is for the Real-time Unit Commitment for the T-105 minutes to T+60 minutes time horizon. In this interval the ISO also conducts 15-minute Ancillary Service Awards for non-Hourly System Resources, internal resources and dynamic external resources for the given Trading Hour.

Real-Time Dispatch (RTD): The five minute interval of any given Operating Hour during which the ISO conducts the market for Energy based on submitted bids and the CAISO Forecast of CAISO Demand.

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California this 15th day of December, 2009.

<u>Isl Jane Ostapovich</u>
Jane Ostapovich