

Stakeholder Process: Outage Management System Proposal

Summary of Submitted Comments

Stakeholders submitted three rounds of written comments to the ISO on the following dates:

- Round One: Straw Proposal posted on August 5, 2013: comments received August 20, 2013
- Round Two: Revised Straw Proposal posted on October 18, 2013; comments received November 7, 2013
- Round Three: Draft Final Proposal posted on December 3, 2013 and Addendum to the Draft Final Proposal posted December 27, 2013; comments received January 3, 2014

Parties that submitted written comments: Pacific Gas & Electric (“PG&E”), San Diego Gas & Electric (“SDG&E”), Six Cities¹, Southern California Edison (“SCE”), Wellhead Electric.

Other parties that participated in conference calls, but did not submit written comments: APX, California Department of Water Resources, California Public Utilities Commission, CalPeak, Calpine, CES, City of Vernon, DC Energy, Federal Energy Regulatory Commission, Los Angeles Department of Water and Power, Marine Energy, Pattern Energy, Power Costs, Shell Energy, Structure, Thompson Coburn, Turlock Irrigation District, TransAlta, Valley Electric Association, Ventyx, Versify, Viasyn, Western Electricity Coordinating Council, YES Energy.

Stakeholder comments are posted at:

<http://www.caiso.com/informed/Pages/StakeholderProcesses/OutageManagementSystemProject.aspx>

Other stakeholder efforts include:

- Voice of the Customer focus groups: April 22-23, 2013
- Stakeholder conference call: June 24, 2013
- Stakeholder conference call: July 15, 2013
- Stakeholder conference call: August 12, 2013
- Stakeholder conference call: October 31, 2013
- Stakeholder conference call: December 17, 2013

¹ Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (“Six Cities”)

Management Proposal	PG&E	SDG&E	Six Cities	SCE	Wellhead Electric	Management Response
Provide customers with the ability to submit detailed reasons for outage requests.	Supports	(No comment on this proposal)	(No comment on this proposal)	(No comment on this proposal)	(No comment on this proposal)	
Require customers to provide resource outage data at the de-aggregated level.	Supports PG&E requests clarification regarding child resource reporting criteria	(No comment on this proposal)	(No comment on this proposal)	Supports SCE requests clarification regarding child resource reporting criteria	(No comment on this proposal)	Clarification on child resource reporting criteria: Availability reporting of aggregated resource child resources will be required when the child resource is de-rated by 50MW or greater.

Management Proposal	PG&E	SDG&E	Six Cities	SCE	Wellhead Electric	Management Response
<p>Receive transmission outage requests in structured data formats, rather than free-form text.</p>	<p>Supports</p> <p>PG&E requests the ISO to provide additional technical detail, and to work with PTOs to develop a feasible timeline for implementation.</p>	<p>Supports</p> <p>SDG&E is concerned that this initiative appears to cause SDG&E to incur substantial costs (products, labor, etc.) while also appearing to inappropriately shift responsibilities to SDG&E that belong with the ISO, as the grid operator.</p>	<p>(No comment on this proposal)</p>	<p>Not Opposed</p>	<p>(No comment on this proposal)</p>	<p>The ISO is committed to working with stakeholders to alleviate concerns about implementation. Customer Partnership Groups will be facilitated to provide additional technical and business details to ensure this transition is feasible.</p> <p>The intent of this initiative is to receive detailed and structured modeling information, which is then used by reliability study tools and the ISO market. While there may be additional costs associated with implementation, this process will improve efficiency and accuracy. The ISO believes it is in the best interest of grid reliability, and the market, for participants to submit outage requests as structured data, as the PTOs have the best understanding of the correct isolation points in their outage requests. Additionally, this proposal provides assurance to participants that the exact isolation points they submit in the outage requests are being used in the ISO market.</p>

Management Proposal	PG&E	SDG&E	Six Cities	SCE	Wellhead Electric	Management Response
Extend electronic outage processing efficiencies to real-time operations.	Supports	<p>Conditionally Supports</p> <p>SDG&E supports eliminating redundancies and improving overall efficiencies, but does not feel the ISO has demonstrated how this proposal will accomplish those goals. SDG&E's existing real-time format does not support additional "data entry" responsibilities for outage data management, which is currently managed via phone communications with the ISO real-time desk.</p>	(No comment on this proposal)	<p>Strongly opposes</p> <p>SCE strongly opposes the proposed requirements for electronic communication protocols on the basis of degradation to our core obligations of safety, reliability, and situational awareness. SCE asserts that continuing the current verbal communication protocol for all outages is necessary to ensure that our core obligations are met. SCE intends to continue the use of verbal communications for all outages.</p>	(No comment on this proposal)	<p>The intent of this proposal is to increase efficiency, reliability and situational awareness by providing real-time personnel with the ability to prioritize tasks according to levels of criticality. The ISO will continue to work with stakeholders to demonstrate how this proposal will accomplish these goals and simplify the outage process.</p> <p>Additionally, the ISO will continue to encourage the use of oral communications for outage processing whenever it is deemed necessary by the participant.</p>

Management Proposal	PG&E	SDG&E	Six Cities	SCE	Wellhead Electric	Management Response
Align resource and transmission outage request timelines.	<p>Not opposed</p> <p>PG&E believes it will be especially important for the ISO to clearly denote when a forced outage is, and is not, applicable to standard capacity product assessment.</p>	<p>Not opposed</p> <p>SDG&E would like the ISO to provide notification within OMS to indicate when outages are applicable for non-availability penalties.</p>	<p>Not opposed</p> <p>Six Cities believes the process used to count days in applying the deadline for submission of planned outage requests is confusing and inconsistent with other provisions of the ISO tariff. Six Cities urges the ISO to take steps to conform the counting method for outages to the counting method applied in other provisions of the ISO tariff.</p>	<p>Not opposed</p> <p>SCE looks forward to working with the ISO's implementation team to identify the most efficient method to differentiate outages that are, and are not, subject to standard capacity product availability charges.</p>	<p>Not opposed</p> <p>Wellhead is concerned with still maintaining the ability to schedule outages in the planned timeframe.</p> <p>Wellhead proposes the function of resource adequacy replacement be handled inside of outage management system, rather than ISO interface for resource adequacy.</p>	<p>The ISO agrees that it is important to clearly indicate within OMS when an outage request may be subject to standard capacity product non-availability charges. The ISO will continue to work with stakeholders to ensure proper implementation.</p> <p>The ISO understands that the counting method proposed for the resource outage request timeline may be confusing, and will consider changing it in the future after full impacts to the tariff and other processes have been thoroughly vetted.</p> <p>The ISO understands the concern with maintaining the ability to schedule outages in the planned timeframe, and we will continue to inform resources as soon as possible if a resource outage request cannot be accommodated.</p>

Management Proposal	PG&E	SDG&E	Six Cities	SCE	Wellhead Electric	Management Response
Eliminate unnecessary reporting requirements.	Supports	(No comment on this proposal)	(No comment on this proposal)	Supports	(No comment on this proposal)	
Provide customers with the ability to submit ancillary service limitations as structured data.	Supports	(No comment on this proposal)	(No comment on this proposal)	Not Opposed	(No comment on this proposal)	