

October 17, 2022

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 (CAISO) hereby submits its August/September 2022 report covering Market Disruption reportable events under Section 7.7.6 of the CAISO Tariff that occurred from August 16, 2022 to September 15, 2022.<sup>1</sup>

Please contact the undersigned with any questions.

Respectfully submitted

**By: /s/ Sidney Mannheim**

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<sup>1</sup> The CAISO submits the Market Disruption report pursuant to *California Independent System Operator Corp.*, 126 FERC ¶ 61,211 (2009) and Section 7.7.6 (d) of the CAISO Tariff (CAISO Tariff Section 7.7.15 was moved into Section 7.7.6 in the CAISO's Administrative Pricing tariff amendment, see *Cal. Indep. Sys. Operator Corp.*, 158 FERC ¶ 61,085 (2016)).



# **Market Disruption Report August 16, 2022 to September 15, 2022**

October 17, 2022

CAISO Market Analysis and Forecasting

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## 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.<sup>1</sup> Pursuant to Section 7.7.6 of the CAISO Tariff, the California Independent System Operator Corporation (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 CAISO reports Market Disruption occurrence in any of the following circumstances:

- When any of the CAISO market processes fail to publish, including the Integrated Forward Market (IFM), Residual Unit Commitment (RUC), the Real-Time Market which includes the Hour-Ahead Scheduling Process (HASP), Fifteen Minute Market (FMM), and the Real-Time Dispatch (RTD) processes;
- When the CAISO manually overrides the closing of the Day-Ahead Market; or
- Any time that the CAISO 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 CAISO pursuant to Section 7.7.6;
- The nature of the Market Disruptions that caused the CAISO to take action, or the Market Disruptions that were successfully prevented or minimized by the CAISO as a result of taking action, and the CAISO's rationale for taking such actions pursuant to Section 7.7.6;
- Information about the Bids (including Self-Schedules) removed pursuant to Section 7.7.6 (*i.e.*, megawatt quantity, point of interconnection, specification of the Day-Ahead versus Real-Time Bid, and Energy or Ancillary Services Bid); and
- The CAISO's rationale for its removal of Bids (including Self-Schedules) pursuant to Section 7.7.6.<sup>2</sup>

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<sup>1</sup> Section 7.6 and 7.7 of the CAISO Tariff refer to these system operation issues or System Emergencies, respectively. CAISO Tariff, Appendix A, definition of Market Disruption. Capitalized terms not otherwise defined herein have the meanings set forth in the CAISO Tariff.

<sup>2</sup> *Id.* at P 29 & n.29.

**II. Report on Market Disruptions Occurring from August 16, 2022 through September 15, 2022**

The CAISO’s report on Market Disruptions that occurred from August 16, 2022 through September 15, 2022, is provided in Table 1 and Attachment A below. Attachment A includes an entry for each reportable Market Disruption event and each 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 CAISO, 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 during the time period covered by this report. As shown in Table 1, there were a total of 77 Market Disruptions for the reporting period.

**Table 1: Summary of Market Disruption Report**

<b>Type of CAISO Market</b>	<b>Market Disruption or Reportable Events</b>
<b>Day-Ahead</b>	
IFM	0
RUC	0
<b>Real-Time</b>	
Fifteen Minute Market Interval 1	5
Fifteen Minute Market Interval 2	3
Fifteen Minute Market Interval 3	2
Fifteen Minute Market Interval 4	3
Real-Time Dispatch	64

Table 1 above shows the market disruptions in the real time market in order to incorporate the FMM binding intervals.

The frequency of RTD failures increased from 60 to 77 in comparison to the report for the period of July 16, 2022 through August 15, 2022. RTD failures

accounted for approximately 83 percent of all of the Market Disruptions during this reporting period.

On August 31<sup>st</sup> there were 8 (2 FMM, 1 DSTUC and 5 RTD) interval disruptions due to market failures and application time-outs. On August 25<sup>th</sup>, there were 7 (2 FMM, 5 RTD) interval disruptions due to market maintenance. On August 23<sup>rd</sup>, there were 6 (2 FMM, 1 HASP, 3 RTD) interval disruptions due to market patching.

The CAISO made resources non-participating in FMM due to market failures on following days – September 3<sup>rd</sup>. The resources were made non-participating strictly to resolve the FMM issues and not due to bidding concerns. Different resources were made non-participating for each day.

The CAISO made resources non-participating in RTD due to market failures on following days – August 19<sup>th</sup> and August 20<sup>th</sup>. The resources were made non-participating strictly to resolve the RTD issues and not due to bidding concerns. Different resources were made non-participating for each day.

There was a market disruption that occurred from August 24, 2022 from HE 19 interval 4 to HE 19 interval 9 in the RTD market. The disruption occurred due to issues with the application and affected all WEIM entities.

## **Market Disruption for Unique Pricing Feature**

The CAISO implemented a feature to ensure unique pricing under a degenerate condition in November 2015, which was implemented along with other pricing enhancements to improve market efficiency.

Table 2 captured below shows the dates and market in which the pricing feature was disabled between August 16, 2022 until September 15, 2022. The uniqueness feature was enabled for all other intervals across all the markets for the timeframe captured in this report.

### **Table 2: Status of Unique Pricing Feature across Various Markets**

The pricing feature was not disabled between August 16, 2022 and September 15, 2022.

## **ATTACHMENT A**

**California Independent System Operator Corporation  
Market Disruption Report  
October 14, 2022**

**Table 3: Market Disruptions, Nature of Actions Taken by the CAISO, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions**

<b>Count</b>	<b>Date</b>	<b>Hour</b>	<b>Interval</b>	<b>Market</b>	<b>Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions</b>
1	8/16/2022	24	3	RTD	RTD results were blocked and previous solution used.
2	8/16/2022	24	4	RTD	RTD results were blocked and previous solution used.
3	8/17/2022	15	6	RTD	RTD failed due to application time-out. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
4	8/17/2022	15	7	RTD	RTD failed due to application time-out. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
5	8/17/2022	15	8	RTD	RTD failed due to application time-out. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
6	8/17/2022	15	10	RTD	RTD results were blocked and previous solution used.
7	8/17/2022	23	1	RTD	RTD results were blocked and previous solution used.



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
8	8/20/2022	8	1	RTD	RTD results were blocked and previous solution used.
9	8/20/2022	8	2	RTD	RTD results were blocked and previous solution used.
10	8/23/2022	15	4	FMM	FMM did not run due to network failure.
11	8/23/2022	15	8	RTD	RTD did not run due to market patching. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
12	8/23/2022	15	9	RTD	RTD did not run due to market patching. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
13	8/23/2022	15	10	RTD	RTD did not run due to market patching. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
14	8/23/2022	16	1	FMM	FMM did not run due to market patching.
15	8/23/2022	16	2	HASP	HASP did not run due to market patching. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
16	8/24/2022	18	11	RTD	RTD failed due to application problem. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).

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
17	8/24/2022	18	12	RTD	RTD failed due to application problem. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
18	8/24/2022	19	1	RTD	RTD failed due to application problem. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
19	8/24/2022	19	1	DSTUC	DSTUC failed due to application problem.
20	8/24/2022	19	2	RTD	RTD failed due to application problem. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
21	8/24/2022	19	2	HASP	HASP failed due to application problem. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
22	8/24/2022	19	3	FMM	FMM failed due to application problem. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
23	8/24/2022	19	3	RTD	RTD failed due to application problem. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
24	8/24/2022	19	4	RTD	RTD failed due to application problem. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
25	8/24/2022	19	5	RTD	RTD failed due to application problem. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).

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
26	8/24/2022	19	6	RTD	RTD failed due to application problem. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
27	8/24/2022	19	7	RTD	RTD failed due to application problem. RTD results were blocked and previous solution used. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
28	8/24/2022	19	8	RTD	RTD failed due to application problem. RTD results were blocked and previous solution used. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
29	8/24/2022	19	9	RTD	RTD failed due to application problem. RTD results were blocked and previous solution used. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
30	8/24/2022	19	10	RTD	RTD failed due to application problem. RTD results were blocked and previous solution used. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
31	8/24/2022	19	11	RTD	RTD failed due to application problem. RTD results were blocked and previous solution used. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
32	8/24/2022	19	12	RTD	RTD failed due to application problem. RTD results were blocked and previous solution used. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).

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	8/24/2022	20	10	RTD	RTD failed due to application problem. RTD results were blocked and previous solution used.
34	8/25/2022	11	4	FMM	FMM did not run due to market maintenance. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
35	8/25/2022	11	5	RTD	RTD did not run due to market maintenance. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
36	8/25/2022	11	6	RTD	RTD did not run due to market maintenance. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
37	8/25/2022	11	7	RTD	RTD did not run due to market maintenance. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
38	8/25/2022	11	8	RTD	RTD did not run due to market maintenance. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
39	8/25/2022	11	9	RTD	RTD did not run due to market maintenance. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
40	8/25/2022	12	1	FMM	FMM did not run due to market maintenance. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
41	8/26/2022	18	1	RTD	RTD failed due to application time-out. RTD results were blocked and previous solution used.

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
42	8/26/2022	18	2	RTD	RTD failed due to application time-out. RTD results were blocked and previous solution used.
43	8/27/2022	13	1	RTD	RTD results were blocked and previous solution used.
44	8/28/2022	19	1	RTD	RTD results were blocked and previous solution used.
45	8/28/2022	21	10	RTD	RTD did not run due to RTD failure. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
46	8/28/2022	21	11	RTD	RTD did not run due to RTD failure. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
47	8/29/2022	17	2	HASP	HASP did not run due to market patching.
48	8/31/2022	15	11	RTD	RTD failed due to application time-out. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
49	8/31/2022	15	12	RTD	RTD failed due to application time-out. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
50	8/31/2022	17	3	RTD	RTD results were blocked and previous solution used.
51	8/31/2022	24	1	DSTUC	DSTUC did not run due to market failure.

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
52	8/31/2022	24	3	FMM	FMM did not run due to market failure.
53	8/31/2022	24	4	FMM	FMM did not run due to market failure.
54	8/31/2022	24	11	RTD	RTD did not run due to market failure. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
55	8/31/2022	24	12	RTD	RTD did not run due to market failure. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
56	9/1/2022	1	1	RTD	RTD failed due to application time-out. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
57	9/1/2022	1	2	RTD	RTD failed due to application time-out. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
58	9/1/2022	1	3	RTD	RTD failed due to application time-out. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
59	9/1/2022	16	6	RTD	RTD results were blocked and previous solution used.
60	9/1/2022	23	1	DSTUC	DSTUC did not run due to market patching.

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
61	9/1/2022	23	4	RTD	RTD did not run due to market patching.
62	9/3/2022	1	3	RTD	RTD results were blocked and previous solution used.
63	9/4/2022	3	6	RTD	RTD results were blocked and previous solution used.
64	9/4/2022	3	7	RTD	RTD Broadcast failed. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
65	9/6/2022	22	3	RTD	RTD results were blocked and previous solution used.
66	9/7/2022	19	1	RTD	RTD results were blocked and previous solution used.
67	9/8/2022	6	12	RTD	RTD results were blocked and previous solution used.
68	9/8/2022	15	10	RTD	RTD results were blocked and previous solution used.
69	9/8/2022	15	11	RTD	RTD results were blocked and previous solution used.
70	9/8/2022	21	8	RTD	RTD results were blocked and previous solution used.

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
71	9/8/2022	22	3	RTD	RTD results were blocked and previous solution used.
72	9/9/2022	12	7	RTD	RTD results were blocked and previous solution used.
73	9/9/2022	14	7	RTD	RTD results were blocked and previous solution used.
74	9/10/2022	22	1	RTD	RTD results were blocked and previous solution used.
75	9/12/2022	7	4	RTD	RTD failed due to application problem. The market results for this interval were filled based on the tariff sections 7.7.9 and 29.7(j).
76	9/13/2022	7	1	RTD	RTD results were blocked and previous solution used.
77	9/13/2022	15	1	RTD	RTD results were blocked and previous solution used.
Notes:					
Integrated Forward Market (IFM): The Day-Ahead Market run in which the CAISO 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 CAISO conducts unit commitment of additional resources based on submitted availability bids and the forecast of demand for every hour of the next Trading Day.					
Fifteen Minute Market (FMM) 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 CAISO conducts the Market Power Mitigation for submitted Bids, which applies to all of the Real-Time Market processes for the given Trading Hour. In this interval the CAISO also conducts the procurement of incremental Ancillary Services from internal resources and dynamic external resources.					



<p>Fifteen Minute Market (FMM) Interval 2: The second of a series of four market runs conducted every Trading Hour in advance of the Operating Hour during which the CAISO conducts the HASP. In the HASP, the CAISO 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 CAISO 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.</p>
<p>Fifteen Minute Market (FMM) Interval 3: The third of a series of four market runs conducted every Trading Hour. During this interval the CAISO 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 CAISO also conducts the procurement of incremental Ancillary Services from internal resources and dynamic external resources for the given Trading Hour.</p>
<p>Fifteen Minute Market (FMM) Interval 4: The fourth of a series of four market runs conducted every Trading Hour. This interval is for the Fifteen Minute Market for the T-105 minutes to T+60 minutes time horizon. In this interval the CAISO also conducts 15-minute Ancillary Service Awards for non-Hourly System Resources, internal resources and dynamic external resources for the given Trading Hour.</p>
<p>Real-Time Dispatch (RTD): The five-minute interval of any given Operating Hour during which the CAISO conducts the market for Energy based on submitted bids and the CAISO Forecast of CAISO Demand.</p>

## CERTIFICATE OF SERVICE

I 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 17<sup>th</sup> day of October, 2022.

*Is/ Anna Pascuzzo*  
Anna Pascuzzo