



Comments of Pacific Gas and Electric Company on Draft Tariff Language Seven-Day Advanced Outage Submittal

Submitted by	Company	Date Submitted
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Pacific Gas and Electric Company (PG&E) welcomes the opportunity to participate and submit comments on draft tariff language in the stakeholder process for California Independent System Operator’s (CAISO) Seven-Day Advanced Outage Submittal.

Summary

PG&E appreciates that CAISO has included language in their draft tariff language that requires the CAISO Outage Coordination Office to consider system reliability when evaluating outage and outage change requests submitted with less than seven days’ notice. The draft language in Section 9.3.6.3.2, paragraph 3, however, is overly restrictive of a Participating Transmission Owner’s (TO) ability to modify an Approved Maintenance Outage within seven days of the start date of the Outage. This restriction could have the unintended effect of compelling Participating TOs to submit overly conservative outage plans to ensure that all possible contingencies are covered. PG&E believes this situation can be partially ameliorated by giving the CAISO Outage Coordination Office the option to approve outage requests submitted with less than seven days’ notice as an Approved Maintenance Outage, in addition to the current draft tariff language options, to reject or approve as an Unplanned Transmission Maintenance Outage.

Comments

Consideration of Reliability

PG&E thanks CAISO for inclusion of language in its draft tariff language including reliability as a key factor to consider when evaluating outage requests with less than seven days’ notice.

“...a request for a Planned Transmission Maintenance Outage or a request to change an Approved Maintenance Outage less than seven days in advance of the start date for the Outage...the CAISO Outage Coordination Office may...reject the request as untimely, or approve the request as an Unplanned Transmission Maintenance Outage...and the

analysis determined that (i) the Outage is necessary for reliability, (ii) system conditions and the overall Outage schedule provide an opportunity to take the facilities out of service without a detrimental effect on the efficient use and reliable operation of the CAISO Controlled Grid, and (iii) the Outage has not already commenced as a Forced Outage.” (Underline added, Draft Tariff Language, Section 9.3.6.3.2, paragraph 3)

In its earlier comments, PG&E expressed its opinion that reliability was of paramount importance to the system and therefore should be evaluated when outage changes are made with less than seven days’ notice.

Proposed Tariff Overly Restrictive on Modifying Scheduled Outages Within Seven Days of Start

While the language discussed in the previous section is a move in the right direction, overall the proposed changes to the CAISO Tariff are overly restrictive of a Participating TO’s ability to modify – and the CAISO Outage Coordination Office’s discretion to approve – an Approved Maintenance Outage within seven days of the start date of the Outage. The proposed tariff amendments are unrealistic in expecting transmission owners to be able to plan for every contingency to ensure that outages fit within the schedule for a Planned Maintenance Outage. The CAISO Tariff should allow sufficient flexibility to allow Participating TOs to make necessary changes to the schedule for an Approved Maintenance Outage within seven days (actually nine days in light of the counting protocol specified in Section 9.3.6.3.2, paragraph 2) of the start date for the Outage, without automatic penalties. The currently proposed, overly restrictive tariff language could have effects and ramifications that could have a detrimental impact on the CAISO grid.

Unlike existing Tariff Section 9.3.6.4, which allows a Participating TO to submit changes to Maintenance Outage information at any time, new Section 9.3.6.3.2, paragraph 3 would mean that any such request submitted within seven days in advance of the start date, if approved, would automatically change a previously approved Planned Transmission Maintenance Outage into an Unplanned Transmission Maintenance Outage. Section 9.3.6.3.2, paragraph 3 states:

“If a Participating TO submits . . . a request to change an Approved Maintenance Outage less than seven days in advance of the start date for the Outage, the CAISO Outage Coordination Office may, at its discretion, reject the request as untimely, or approve the request as an Unplanned Transmission Maintenance Outage . . .”

In other words, the CAISO Outage Coordination Office has only two options in response to a request to change the schedule for an Approved Maintenance Outage: (1) reject the request; or (2) approve the request as an Unplanned Transmission Maintenance Outage. Under proposed Section 9.3.6.3.2, paragraph 3, the CAISO Outage Coordination Office has no discretion to approve the request as an acceptable modification to an Approved Maintenance Outage, even where the change is necessary, due to circumstances outside of the control of the Participating TO, such as extreme weather conditions, or a very minor change. This would unfairly penalize

Participating TOs for circumstances outside of their control and unintentionally create incentives for Participating TOs to be ultra conservative in their scheduling, resulting in longer outages in order to ensure that all possible events fit within the schedule.

As PG&E has explained in its prior comments on the CAISO's seven day notice proposal, the CAISO's proposal fails to recognize the multitude of factors that need to be managed for transmission outages and that could result in changes to the schedule once a project has started. If there is insufficient flexibility to allow for schedule changes when such unforeseeable events occur, the transmission owner could be required to include excessive amounts of time for such contingencies in the schedule.

For example, in the event that the ability to start work on a project is delayed, the unduly punitive provisions of Section 9.3.6.3.2, paragraph 3 would discourage Participating TOs from postponing the scheduled start date. For example, a Participating TO may schedule a planned outage to begin on May 1, but sudden, unforeseen severe weather conditions indicate on April 27 that the start date must be postponed a few days. Under Section 9.3.6.3.2, paragraph 3, however, a request to change the start date of the planned outage from May 1 to May 4 must either be rejected or approved as an Unplanned Transmission Maintenance Outage. Instead of risking either result, the Participating TO may instead decide to keep the May 1 planned outage date, even though the work will not commence until several days later. This results in the CAISO losing the otherwise available transmission capacity of potentially critical transmission assets during that time.

As a result, the mandatory provisions of Section 9.3.6.3.2, paragraph 3, which eliminate the CAISO Outage Coordination Office's discretion to approve necessary modifications submitted within the seven day window as part of an Approved Maintenance Outage, could influence Participating TOs to increase the amount of time needed for maintenance of transmission assets, which could result in unnecessarily long outages of potentially critical assets in the CAISO grid. At a minimum, Section 9.3.6.3.2, paragraph 3 should allow the CAISO Outage Coordination Office the additional option at their discretion to approve a request to change an Approved Maintenance Outage submitted less than seven days in advance as a permissible change to a Planned Transmission Outage.

Minor Language Corrections

In this section, PG&E points out areas in the draft tariff language where CAISO may want to make further changes.

- 1) With the changes in the draft tariff language, Section 9.3.3 no longer applies to Transmission facilities. CAISO may want to change the heading of the section to reflect that by renaming it, "Requests For Generation Outages In Real-Time Operation."
- 2) Section 9.3.6.2 no longer applies to Transmission facilities. CAISO may want to change the heading of the section to, "90 Day Look Ahead for Generation Outages."

- 3) Section 9.3.6.4 currently is labeled, “Changes to Planned Maintenance Outages,” but within the body of that section “planned” is deleted from the phrase “planned maintenance Outage.” CAISO may want to change the heading to “Changes to Maintenance Outages.”
- 4) In the same spirit as item 3 above, in Section 9.3.8.1, the CAISO should consider changing the instances of “planned Maintenance Outage” to “Maintenance Outage.”
- 5) It appears that Sections 9.3.8.3 and 9.3.8.5 apply only to Participating Generators. Therefore CAISO may want to modify the headers to “One (1) Day Prior Notification for Participating Generator” and “Delay by A Participating Generator,” respectively.
- 6) For the definitions of both “Planned Transmission Maintenance Outage” and “Unplanned Transmission Maintenance Outage”, append “and granted by the CAISO Outage Coordinated Office” to the end of each.