

November 9, 2020

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. ER08-1178-000 and EL08-88-000**

**120-day Exceptional Dispatch Informational Report
July 1, 2020 through October 31, 2020**

Dear Secretary Bose:

The California Independent System Operator Corporation (CAISO) submits the attached informational report to include Exceptional Dispatch data for the 120-day period from July 1, 2020 through October 31, 2020.

In its September 2009 Order, the Commission directed the CAISO to file reports every 120 days that describe the status of the CAISO's efforts to reduce the frequency of Exceptional Dispatch and the status of the CAISO's development of operational and product enhancements that would reduce reliance on Exceptional Dispatch.¹ The 120-day informational report is in addition to the Table 1 and Table 2 monthly Exceptional Dispatch reports the CAISO files in the above-referenced dockets.²

¹ *Cal. Indep. Sys. Operator Corp.*, 128 FERC ¶ 61,218, at PP 50-51 (September 2009 Order). The Commission explained that it “does not intend to notice these future status reports or to issue orders on these in the future, as these reports are for informational purposes only.” *Id.* at P 51 n.66.

² *Id.*, and *Cal. Indep. Sys. Operator Corp.*, 131 FERC ¶ 61,100 (2010). The CAISO now files both Table 1 and Table 2 at the same time on the 15th of each month.

Honorable Kimberly D. Bose
November 9, 2020
Page 2

Please contact the undersigned with any questions regarding this filing.

Respectfully submitted,

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California ISO

**120-day
Exceptional Dispatch Report**

**Prepared by
California Independent System Operator**

November 9, 2020

Table of Contents

- 1. Introduction3
- 2. Exceptional Dispatch Data and Reports3

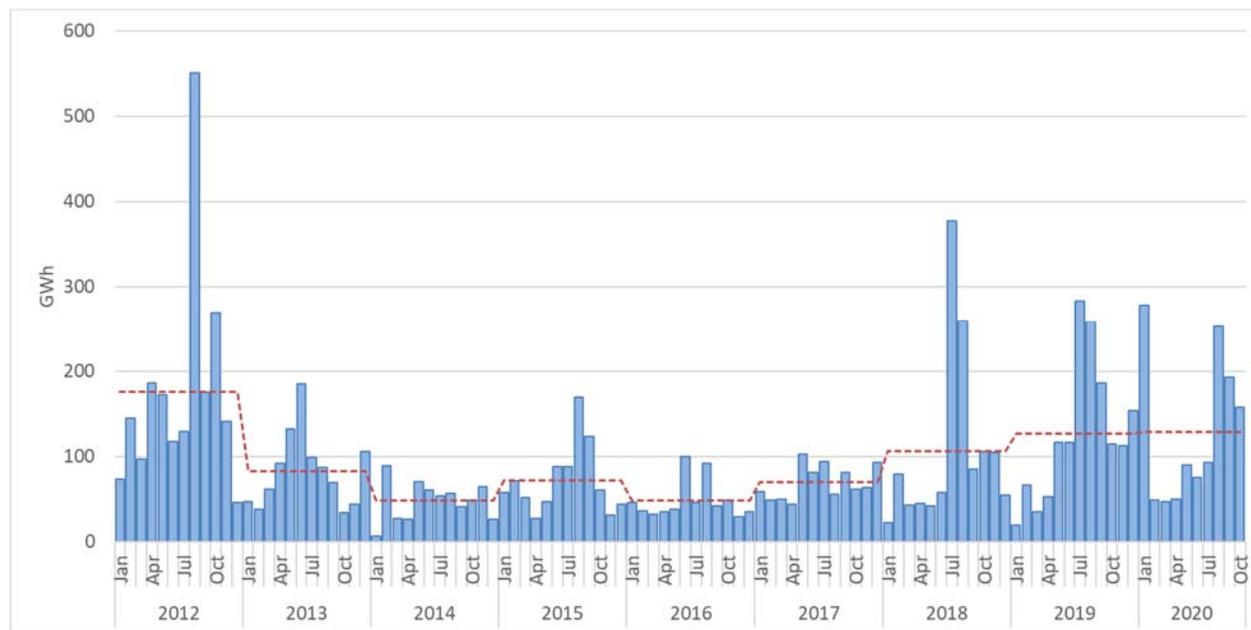
1. Introduction

This informational report by the California ISO (CAISO) provides an update to the Commission and market participants on the exceptional dispatch metrics and the measures the CAISO took to reduce reliance on exceptional dispatch for the period from January 2012 through October 2020. This report covers the 120-day period from July 1, 2020 through October 31, 2020¹.

2. Exceptional Dispatch Data and Reports

As shown in Figure 1 below, the year-to-date average volume of exceptional dispatches for 2020 is higher than 2019 due to high volumes of exceptional dispatches in the month of August and September. The yearly average volume has remained relatively stable at low levels for recent years with the exception of peak summer conditions when exceptional dispatches are necessary to manage contingencies as evident from the August - September 2020 volume. The increase in August 2020 exceptional dispatch was primarily due to peak demand conditions and high temperatures along with fires.

Figure 1: Exceptional Dispatch Volume from January 2012 to October 2020



The exceptional dispatch volume was higher in the July to August 2020 time-period compared to the prior 120-day period. The volume of exceptional dispatches increased significantly in August and September months, due to ramping capacity, load forecast uncertainty and planned transmission outage and reliability assessment as shown in figure 3. Due to extreme heat waves along with fires, it was necessary to exceptional dispatch resources to meet the evening ramp. As explained in Operating Procedure 2330C², Reliability Assessment is the reason that

¹ The ISO's 120-day reports are available on the ISO website at: <http://www.caiso.com/rules/Pages/Regulatory/RegulatoryFilingsAndOrders.aspx>.

² Operating Procedure 2330C - <http://www.caiso.com/Documents/2330C.pdf>.

encompasses Control Point (CP), Interconnection Reliability Operating Limit (IROL), System Operating Limit (SOL) and congestion related EDs, to mitigate reliability issues identified through the real – time assessment tools such as Real Time Contingency Analysis (RTCA), Voltage Stability Analysis (VSA), Dynamic Stability Analysis (DSA) and/or Operating Procedure (OP) or offline study.

From August 14 – 19, 2020, California and the neighboring states as a whole experienced an extreme heat storm, with temperatures 10-20 degrees above normal. Due to the extreme heat wave, CAISO issued Grid Stage 3 System Emergency on August 14 and 15. The exceptional dispatch volumes increased significantly due to the extreme heat wave in August and first few days in September 2020. These exceptional dispatches were driven by ramping capacity (about 32% of total exceptional dispatch volume), load forecast uncertainty (about 23% of total exceptional dispatch volume), planned transmission outage (about 17% of total exceptional dispatch volume), reliability assessment (about 17% of total exceptional dispatch volume), as shown in the figure 4.

Figure 2: Daily Exceptional Dispatch Volume from July 2020 to October 2020

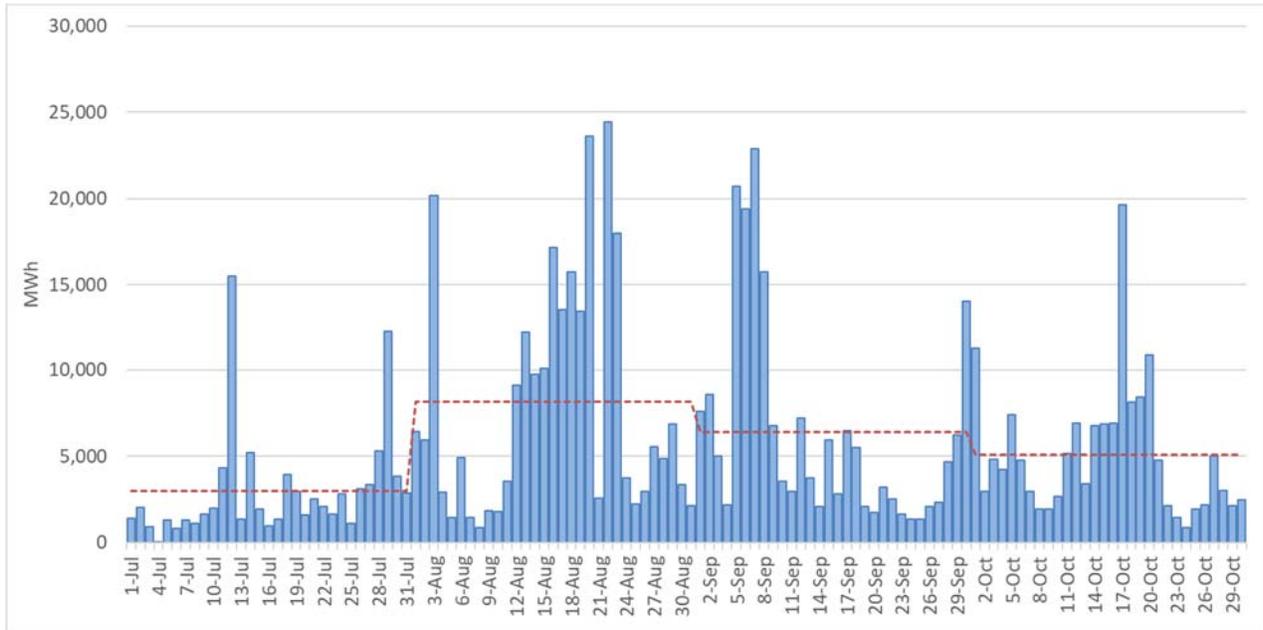


Figure 4, shows the hourly pattern of exceptional dispatch volume for July 2020 to October 2020.

Figure 3: Daily Exceptional Dispatch Volume for July 2020 to October 2020 by Reason

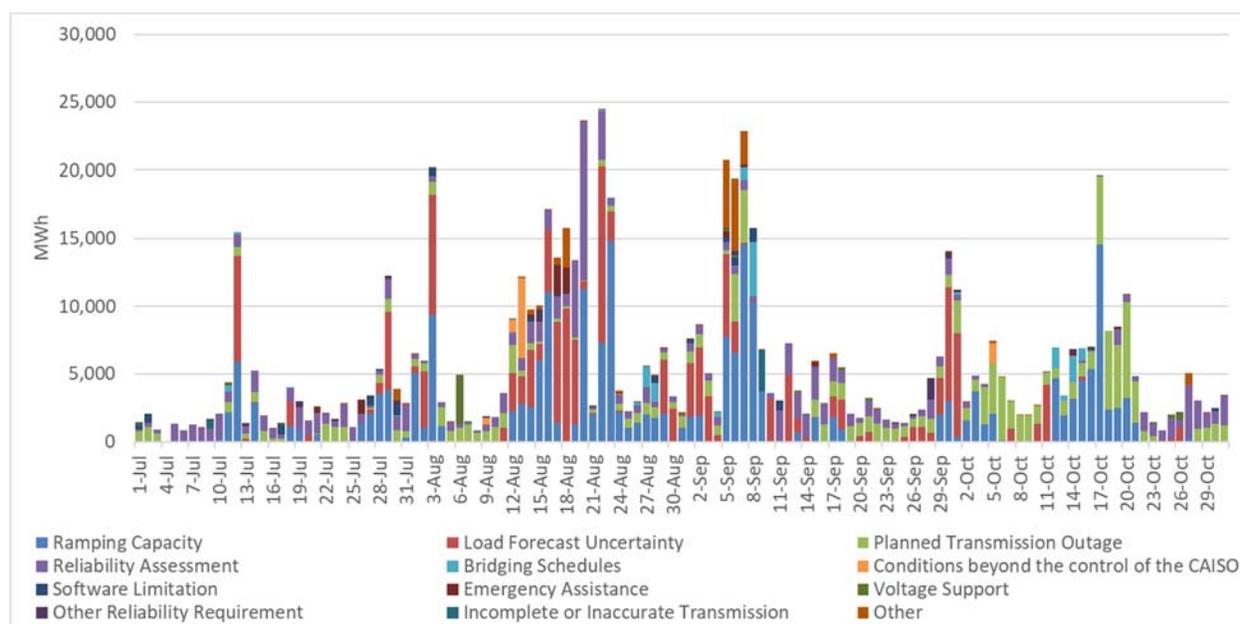
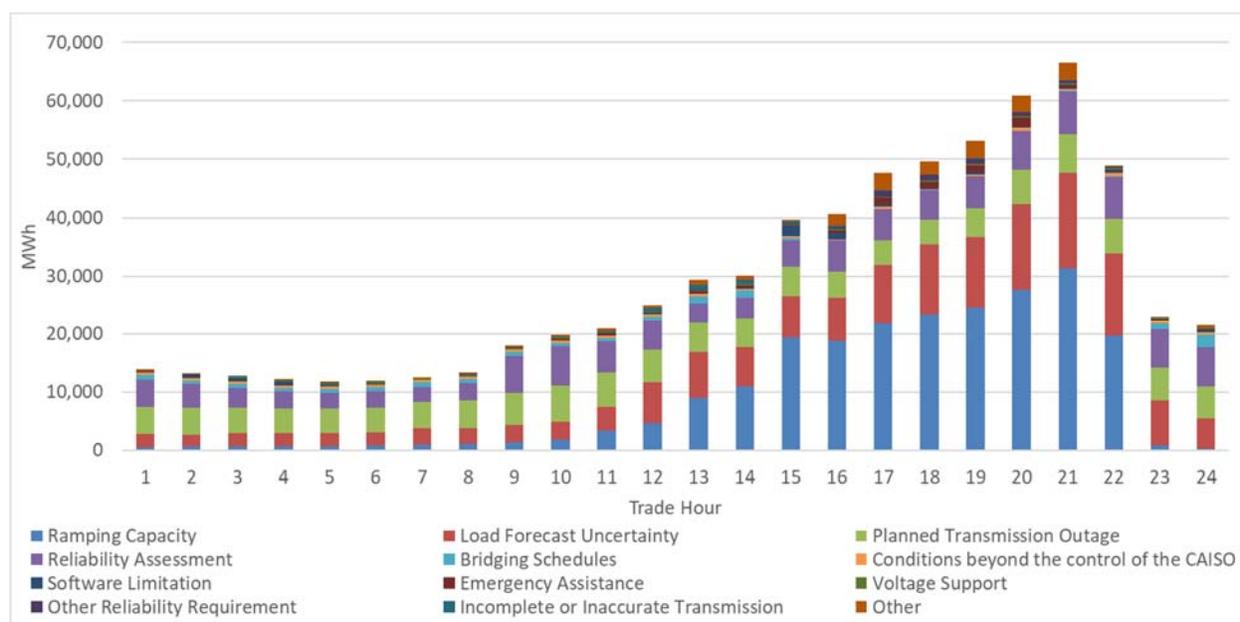


Figure 4: Hourly Exceptional Dispatch Volume for July 2020 to October 2020 by Reason



To comply with Commission directives and inform the market, as reflected in orders and the CAISO tariff, the CAISO produces and files two monthly exceptional dispatch reports in Docket No. ER08-1178, in addition to the 120-day reports that the CAISO is now resuming. One report (the Table 1 report) is filed on the 15th day of every month and the other report (the Table 2 report) is filed on the 30th day of every month. The CAISO has filed the Table 1 and Table 2 reports each month. These monthly reports provide the market with the most recent summary

of exceptional dispatch activity and associated costs. The monthly reports are also available on the CAISO's website at: <http://www.caiso.com/market/Pages/ReportsBulletins/Default.aspx>.

The CAISO also publishes a monthly market performance report at: <http://www.caiso.com/market/Pages/ReportsBulletins/Default.aspx>. This monthly report highlights the frequency and cost of exceptional dispatch as a subset of the broader category of operator intervention. The report is published approximately three weeks after the end of every month and is based on preliminary settlement data available about 10 days after the end of the month.

Additional information is also explained in detail in the Market Performance Metric Catalog that the CAISO issues on a monthly basis. This report provides the explanation and context for each market metric, including information on exceptional dispatch. It is available at: <http://www.caiso.com/market/Pages/ReportsBulletins/Default.aspx>.

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 9th day of November, 2020.

/s/ Jacqueline Meredith
Jacqueline Meredith