

# Transmission-Induced Generation Outages

## *White Paper*

Dated: December 7, 2018  
Comments Submitted: December 17, 2018

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### **Summary:**

Calpine supports the proposed clarification that like *forced*, transmission-induced, generation outages (TIGO), *planned* TIGOs will also be exempt from the Resource Adequacy Availability Incentive Mechanism (“RAAIM”). While Calpine will continue to coordinate transmission outages with the PTO, we concur with the findings of the CAISO, as well as the representations to the Board that events “beyond the resource’s control” should not expose the resource to availability penalties.

In addition, Calpine requests that the CAISO clarify that in conjunction with the RAAIM exemption, as needed the tariff, BPMs and Operating Procedures be modified to eliminate any RA (local, system or flexible) replacement obligation associated with TIGOs.

As discussed on the call, we also believe that other matters “beyond the resource’s control”, including natural gas and or environmental limitations should also be exempt from the replacement obligation and RAAIM.

Thanks