

DC Energy, Comments on Stakeholder Initiatives Catalog

Submitted by	Company	Date Submitted
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DC Energy appreciates the opportunity to provide comments on the California Independent System Operator (CAISO), October 7, 2015 Draft 2015 Stakeholder Initiatives Catalog. DC Energy requests the CAISO add the following item to section 6.5 Congestion Revenue Rights of the catalog.

Improved requirements for transmission outage submission

According to the Outage Management Business Practice Manual¹, “requests for planned outages of Significant Facilities must be submitted to CAISO Outage Coordination at least 30 days prior to the start of the calendar month for which the outage is planned to begin”. The Significant Facilities, which are subject to the “30-day rule” include the following Transmission facilities of the CAISO Controlled Grid:

1. rated above 200 kV (except for CAISO-approved exceptions), or
2. that are part of any defined flow limit as described in a CAISO operating procedure (except for CAISO-approved exceptions), or that were out of service in the last three years and for which the CAISO determined a special flow limit was needed for real-time operation.

The “30-day rule” is intended to improve the fidelity of the Monthly CRR network models, however the current construct does not include an incentive mechanism for adhering to the rule. That is, the rule is advisory only and there is no implication for schedules submitted inconsistent with the rule’s timeline. That being said, adhering to the rule has numerous important benefits since outages on Significant Facilities significantly impact the amount of CRR network capacity offered and the resultant CRR revenue adequacy. In addition, it promotes the transparency of high impact outages, which can help rationalize CRR clearing prices and foster CRR price convergence. In order to fully realize these benefits DC Energy believes that meaningful incentives need to be put in place and we propose that a dedicated stakeholder initiative for developing an incentive based 30-day rule is carried forward.

¹ Web location: <http://bpmcm.caiso.com/Pages/BPMDetails.aspx?BPM=Outage%20Management>