

Stakeholder Comments

LOSS OF LOAD PROBABILITY/PRSS

Note: Themes and targeted segments to be defined by each project				
Theme	IOUs	Munis (BAMx ¹)	Regulators	Generators
1. What additional scenario analyses that you would like to see in the CAISO PRRS Study Scope & Work Plan? Please provide specific reasons for suggesting additional scenario analyses.		No further comments		
2. The CAISO, in discussion with the CPUC and CEC, considers changing the beginning of the 10-year PRR study with 2010, 2014 and 2019. This will modify the deliverables and their schedule to achieve an early 2009 deliverable for review in the CPUC proceeding for the 2010 compliance year. This change and others are being made to be responsive to the three entity (CAISO, CPUC, and CEC) coordination mentioned orally at the stakeholder meetings, in contrast to he		We support the change to look at 2010, 2014 and 2019. 2010 would be consistent with 2010 and 2012 LT LCR analysis the CAISO is currently concluding. Longer term planning horizon would also be consistent with transmission planning considerations in trade-off analysis of generation additions.		

¹ BAMx, Bay Area Municipal Transmission group consisting of Alameda Power & Telecom, City of Palo Alto Utilities, and City of Santa Clara (Silicon Valley Power).



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<p>scope of project document.. Please provide comments if you would support this change, and if not, please provide solid reasons for not supporting this change.</p>				
<p>3. What other suggestions would you want the CAISO consider to the tentative schedule of the PRRS Study Scope & Work Plan? Please provide solid reasons for suggesting those changes.</p>		<p>No further comments</p>		
<p>4. Confidentiality of data is an issue that was surfaced and that the PRRS project will need to address. To provide transparency and to address confidentiality issue that was raised regarding generation outage rate data, the CAISO is proposing to use the latest 5-year NERC Generation Availability Data System (GADS) report for calculating Demand Equivalent Forced Outage Rate (EFORd). Using the NERC GADS data would eliminate the need for reconciling various generator outage data that the LSEs, CAISO or Generation Owners may</p>		<p>4. CAISO should utilize actual historic outage data indicated in the Work Plan at page 4. In the Grid Standards Work Group 2, their plans are to utilize actual, historic outage data. Prior analysis that lead to the development of the current SF Generation Outage Standard have found that use of actual outage data can be as high as 20-times the NERC GADS EFORd data, since the NERC data are averaged and aggregated by generation types across the industry.</p>		



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<p>have. In addition, this would allow third party to obtain the data by requesting NERC and affected Generation Owners directly, and not the CAISO. Please provide your comments whether you would support this proposal from the CAISO. For data that are not in NERC GADS (i.e., small wind turbines), the CAISO will try to obtain from the Generator Owners, and the data will be subject to confidentiality agreement between the ISO and the Generator Owners. Other alternative would be to work with the CEC to obtain the intermittent resources data.</p> <p>5. Since the CAISO operates and controls the transmission facilities, outages on the transmission paths linking the study areas will be provided by the</p>		<p>5. Agree with the described approach in obtaining transmission outage data. The CAISO should explain the reasons why applicable confidentiality agreements</p>		



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<p>CAISO, with verification from the affected Transmission Owners. Other method would be to obtain data from WECC as applicable. Applicable Non-Disclosure Agreement, subject to CAISO legal counsel approval, will be needed to obtain the data. Please provide your comments whether you would agree with this approach.</p>		<p>would be required if so determined by the CAISO.</p>		
<p>6. The four Vendors presented different programs, methodologies and approaches to calculate the Study Objective of Loss of Load Expectation (LOLE) of 1 day in 10 years (or 0.1 days per year) and the corresponding Planning Reserve Requirement. Please provide comments, if any, on which program and methodology from these four Vendors that you suggest the CAISO, the CPUC and the CEC should consider adopting. Please articulate the reasons for your suggestions.</p>		<p>No comments on program or methodology.</p>		

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<p>7. If none of the above program or methodology meets your expectation for an LOLE calculation and corresponding Planning Reserve Requirement (PRR), please provide suggestion on which method and program to use. Please be specific in this response and the reason on why your approach and program are considered a better alternative. Please provide specific supporting documentation and reference on a different approach and program in responding to this question. In addition, please indicate if your suggested alternative is considered an industry standard in calculating LOLE in Planning Reserve Margin.</p>		<p>While LOLE specific algorithms would provide guidance on sufficient generation availability, it seems appropriate to look at Generation Expansion algorithms that would not only calculate LOLE, but also consider total investment & production costs in arriving at the Future Generation Capacity mix. As currently proposed in the Work Plan, the Future Generation Capacity mix will be varied deterministically as to the mix of 500 MW CCs, 50 CTs, renewable resources, and others without knowledge of overall costs of such mix or expansion. Perhaps such costs analysis could occur at a later time.</p>		
<p>8. Extended discussion was on the subject of the merit of performing the 10-area study. It appears from the Stakeholder meeting that many Stakeholders support the three-area (as well as the whole CAISO system) study, but had questions on the merits of</p>		<p>Case II of the Work Plan is an attempt to look at the ten Local Reliability Areas previously identified by the CAISO. To the extent such an analysis would be useful and perhaps provide further guidance as to the basis for the current LCR areas, Case II analysis should coincide with the</p>		

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<p>the 10-area study. Please provide your comments whether the CAISO should continue consider Case II (ten-area study), and if not, please provide reasons for recommending not to proceed with it. Another option would be modifying the original 10-area approach to better address LCR issues or to learn things related to, but not precise substitutes for, the current deterministic LCR process.</p>		<p>current LCR areas that LSEs are obligated to meet. The CPUC RA proceeding had promised that the LCR Study approach would consider an LOLP analysis, thus the areas being studied should coincide with the current LCR areas. In addition this evaluation by LCR areas would be consistent with the planned analysis by the Grid Planning Standards Work Group 2 under current review in applying a generation outage criteria to each LCR area CAISO-wide.</p>		
<p>9. The CAISO proposes to have these criteria to select Vendor for this Study: (a) program capability; (b) Vendor's knowledge and experience; (b) study cost and (c) Vendor's ability to complete the study schedule based on final negotiated schedule as part of the finalization of the project scope. Please provide additional suggestions to the criteria above and solid reasons for including those criteria for Vendor's</p>		<p>No further comments on the Vendor selection criteria.</p>		



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selection.				