



Submit comment on Draft tariff language and May 24, 2022, stakeholder call discussion

Initiative: FERC Order No. 881 - managing transmission line ratings

**Comments of California Wind Energy Association (CalWEA)
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1. Please provide your organization's comments on the FERC 881 - Managing Transmission Line Ratings May 24 stakeholder call discussion: *

A: General Comments:

The FERC Order 881 implementation timeline is July 12, 2025. While CalWEA strongly supports CAISO's efforts in this area, we believe that there are immediate steps that can be taken earlier to achieve some of the basic goals of Order 881. We understand that such steps should only involve CAISO implementing simple changes in its systems and operating practices. During the call, a CAISO representative mentioned that CAISO is open to other ideas or recommendations from its stakeholders.

CalWEA proposes one simple change in its operating practices, to take effect before calendar year 2023: for those transmission facilities where seasonal ratings are available to CAISO from its PTOs, CAISO would use the same temperature forecast used for its DA Market scheduling to determine the relevant seasonal facility rating that would be used for DA Market scheduling (and later for RT Market operation). This process would replace the existing CAISO practice of changing the rating of its transmission facilities based on calendar dates and instead base the rating on the actual ambient temperature forecast.

B. Presentation comments:

CAISO requested stakeholders' comments on specific presentation slides. CalWEA's responses are as follows:

Slide 10 of 20:

The CAISO does not intend to modify the Transmission Control Agreement.

Do stakeholders have a different view and believe modifications to the TCA are necessary?

- CalWEA does not have any Comment on this matter at this time.

Slide 11 of 20:

The CAISO does not intend to impose additional tariff requirements on WEIM entities but will account for WEIM Entities' rating methodologies.

Do stakeholders have a different view and believe changes to section 29 of the CAISO tariff are necessary?

- CalWEA does not have any Comment on this matter at this time.

Slide 12 of 20:

The CAISO does not intend to impose additional tariff requirements on RC Customers but will account for RC Customers' rating methodologies.

Do stakeholders have a different view and believe changes to section 19 of the CAISO tariff are necessary?

- CalWEA does not have any Comment on this matter at this time.

Slide 13 of 20:

Order No. 881 encourages RTOs/ISOs to coordinate implementation of transmission ratings methodologies. CAISO is not proposing to create methodology requirements for participating transmission owners or WEIM Entities.

Do stakeholders have a different view and believe the CAISO must create methodology requirements that apply to participating transmission owners or WEIM Entities?

- CalWEA's preference would be that CAISO create methodology requirements that are consistent across its PTOs and WEIM entities.

Slide 14 of 20:

The CAISO will propose to use ambient adjusted ratings in its day day-ahead and real real-time markets.

CAISO will propose to require submission of ambient adjusted ratings by market close to allow time for CAISO validation and market systems to utilize ratings.

Do stakeholders have any perspective on the use of ambient adjusted ratings in the CAISO's markets or the timing to incorporate ratings?

- CalWEA strongly supports this CAISO proposal.

CAISO will also propose participating transmission owners validate ambient adjusted ratings prior to submission.

Does this proposed requirement create any stakeholder concerns?

- CalWEA supports this CAISO proposal provided that it does not lead to unnecessary delays in updating these ratings for CAISO market and system operation.

CAISO will use seasonal rating if data or system issues prevent use of ambient adjusted rating.

- CalWEA requests that CAISO flag such issues for all stakeholders.
- CalWEA recommends using transmission facilities' seasonal ratings based on the same weather forecast that CAISO uses for its DA Market, rather than based on the season as determined by the calendar. For example, during a summer season, facilities' winter ratings should be selected when forecasted temperatures are in the cooler winter range. Implementation in 2023 should allow for development of necessary tools for implementation.

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The CAISO proposes to use ambient adjusted ratings from the real real-time market in its real real-time contingency analysis.

Do stakeholders have any perspective on which ratings to use in RTCA, or potential variance between CAISO and participant RTCAs?

- CalWEA recommends that CAISO use the most accurate method -- ambient adjusted normal/emergency ratings -- during system contingencies. (No comment on potential variance between CAISO and participant RTCAs.)

The CAISO requests stakeholder comment on the planned utilization of ambient adjusted ratings in remedial action schemes.

- CalWEA likewise recommends that CAISO use the most accurate method -- ambient adjusted normal/emergency ratings -- in its RAS implementation.

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Seasonal ratings will apply to any long long-term transmission service provided by the CAISO.

Do stakeholders have any comments on how, if at all, the CAISO should address this issue in its Order No. 881 compliance filing?

- CalWEA does not have any Comment on this matter at this time.

Slide 17 of 20:

Order 881 requires the CAISO to implement systems and procedures necessary to allow electronic updates to ratings at least hourly.

- Ratings submitted by participating transmission owners directly into the EMS through SCADA or similar systems

- Use of other electronic systems, such as Inter-Control Center Communication Protocol

Do stakeholders have any perspectives on allowing both functionalities to accommodate PTOs, EIM Entities and RC Customers?

- CalWEA recommends that both functionalities be allowed because sometimes for certain entities, ICCP is addition/augmentation to SCADA for specific facilities and not a backup/replacement.

Do stakeholders have perspectives on whether the CAISO should include tariff language governing dynamic line ratings, e.g., a definition and language recognizing dynamic line ratings in transmission rating methodologies?

- Since FERC and CAISO will be further exploring DLR implementation in coming years, this may not be necessary. However, one of the directives from Order 881 is for CAISO to prep the system for DLR type data and handling. So, for that purpose, defining DLR now may be helpful.

Slide 18 of 20:

Order No. 881 requires the CAISO to maintain a database of ratings and methodologies on OASIS or another password-protected website.

CAISO proposes to limit this database to ratings and methodologies of participating transmission owners and not include EIM Entities or RC Customers

Do stakeholders have any comments on these compliance requirements the CAISO should consider?

- CalWEA recommends including EIM entities and RC customers for consistency and transparency.

2. Please provide a summary of your organization's comment on the FERC 881 - Managing Transmission Line Ratings draft tariff language: *

Minor comments included in redlined tariff language document (see separately uploaded document).

3. Please upload redlined tariff language using the "attachments" field below. *