

OMS Resources Work Group

RASC Feedback on OMS-MISO Survey Results Report & Extended Unit Outage Proposal

Due: April 26, 2017

(1) OMS-MISO Survey Report Revisions

Q. Is there a preferred graphic for the zonal and regional rollup?

A. The OMS RWG prefers the zonal rollup of stacked columns (previous format) on page 9 over the floating format on page 12 for the “Capacity against Reserve Requirement.” Further, the group supports the floating format on page 13 versus the previous format on page 7 on the regional rollup.

Q. How should the ranges be characterized, in writing and verbally?

A.

OMS RWG requests that the phrase “projected capacity” should be changed to “surveyed capacity”. We request this change throughout all results presentations. Referencing the presentation [OMS-MISO Survey](#) on page 6 or 9 or 12 for the chart title, we would prefer the title, “Surveyed Capacity against Reserve Requirement.” On page 7 or 10, we would like the title to be, “Surveyed Capacity Position in ICAP GW (% Reserves).

Pertaining to the additional information included in the survey, the wind and solar UCAPs are stated as ICAPs should be footnoted in the presentation.

Additionally the OMS RWG requests clear slides presenting what the survey and results are not (and why). For example, the survey is not:

- A complete representation of all resources in the queue in the roll-up of results (need to be conservative, historical drop-out rates, etc.);
- A forecast or projection (it is a snapshot of current plans, plans that are always changing);
- Submitted by 100% of all Load Serving Entities (survey is not mandatory, but good participation has historically occurred);
- Able to capture ever-changing facts on proposed generators, existing generators, bi-lateral contracts, etc. (business decisions form year to year can change things rapidly);
- Able to project changes in load forecasts (these forecasts are updated annually by each LSE);
- Is there anything not included in the survey that should have been included in the survey?

(2) MISO's Proposed Treatment of Units on Extended Outage

Q. Should this risk be mitigated in the short term or defer to Seasonal Resource Availability and need?

Q. Is there a minimum length of outage time to disqualify a resource to participate in the PRA?

Q. Does the length of time change if outage occurs over Summer, Shoulder, or Winter months?

Q. Should a generator be penalized or procure replacement capacity if a long duration outage occurs during the PY?

The OMS RWG supports the status quo at this time, of the shared risk across the MISO footprint. Generators should continue the allowance, when they are on an outage, including the entire planning year to participate in the Planning Resource Auction (PRA). Also the generator should be subject to mitigation from the IMM if said generator does not participate in the auction, or withholds capacity.

The OMS RWG requests that MISO provide additional information on the statement that “up to ten generators are on outage for significant portions of the planning year and are known prior to the PRA.” The OMS RWG believes there was insufficient information to provide adequate answers at this time, due to too many unknowns.

Useful information would include:

- Are there frequent “repeat offenders,” or are they different units every year
- Location of these generators, by LRZ or sub-region

The OMS RWG believes there should be balanced limits placed on planned outages during peak times. How to strike this balance, however, will likely require the more in-depth analysis that will be a part of the seasonality discussions in the second half of 2017.