Transmission Outage Coordination

OC 3/9/2023 IMM



Topics

- Effectiveness of first time submission rule
 - The rules are related to the FTR auctions
 - The purpose of the rules is to prevent outages to be submitted after the close of FTR auction
- Effectiveness of rescheduling rule
- Transparency and effectiveness of outage selection process in the FTR model



First Time Submission Rules (On Time or Late)

Planned Duration		
(Calendar Days)	Request Submitted	Received Status
	Before the first of the month one month prior to the starting	
<=5	month of the outage	On Time
	After or on the first of the month one month prior to the starting month of the outage	Late
	Before the first of the month six months prior to the starting	Laic
> 5 & <=30	month of the outage	On Time
	After or on the first of the month six months prior to the starting month of the outage	Late
>30	Before the earlier of 1) February 1, 2) the first of the month six months prior to the starting month of the outage	On Time
$\langle Z \rangle$	After or on the earlier of 1) February 1, 2) the first of the month six months prior to the starting month of the outage	Late
Manual 3, Page 62	2 and 63	alytics

CTOA 4.8.1

 Each Party shall use reasonable efforts to submit Transmission Planned Outage schedules one year in advance but by no later than the first of the month six months in advance of the requested start date for all outages that are expected to exceed five (5) working days duration, with regular (at least monthly) updates as new information becomes available.

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Consolidated Transmission Owner Agreement



CTOA 4.8.3 and 4.8.5

- 4.8.3 Each Party shall submit notice of all Transmission Planned Outage to PJM by the first day of the month preceding the month the outage will commence, with updates as new information becomes available.
- 4.8.5 PJM reserves the right to approve, deny, or reschedule any outage deemed necessary to ensure reliable system operations on a case by case basis regardless of duration or date of submission.



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CTOA 4.8.2

 If notice of a Transmission Planned Outage is not provided in accordance with the requirements in Section 4.8.1 above, and if such outage is determined by PJM to have the potential to cause significant system impacts, including but not limited to reliability impacts and transmission system congestion, then the PJM may require the Party to implement an alternative outage schedule to reduce or avoid such impacts.



FTR Model SFT Test

Manual 06 Outage Language

One of the inputs to the Simultaneous Feasibility Test (SFT) is transmission outages

 Transmission line outage schedules, thermal operating limits for transmission lines, that are expected to last for 2 months or more will be included in the determination of simultaneous feasibility for SFT Inputs the Annual FTR Auction and outages of five days or more shall be -Network model included in the determination of simultaneous feasibility for Monthly FTR Auctions as well as outages of shorter duration that -Approved rights are determined through PJM analysis to be likely to cause FTR revenue inadequacy if not modeled

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https://www.pjm.com/-/media/documents/manuals/m06.ashx

-Outages

 Limits -Loop flow Contingencies

-Bids



Transmission Facility Outage Requests by Received Status

			2020/2021				2021/2022		
Planned Dur	ation				Percent				Percent
(Days)		On Time	Late	Total	Late	On Time	Late	Total	Late
<=5		9,912	6,213	16,125	38.5%	9,607	5,580	15,187	36.7%
>5 & <=30		1,577	1,392	2,969	46.9%	1,557	1,315	2,872	45.8%
>30		632	948	1,580	60.0%	600	978	1,578	62.0%
Total		12,121	8,553	20,674	41.4%	11,764	7,873	19,637	40.1%

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Transmission Facility Outage Requests by Congestion Status

		2020/2021				2021/2022	2	
				Percent				Percent
Planned Duration	Congestion	No Congestion		Congestion	Congestion	No Congestion		Congestion
(Days)	Expected	Expected	Total	Expected	Expected	Expected	Total	Expected
<=5	945	15,180	16,125	5.9%	918	14,269	15,187	6.0%
>5 & <=30	246	2,723	2,969	8.3%	211	2,661	2,872	7.3%
>30	105	1,475	1,580	6.6%	107	1,471	1,578	6.8%
Total	1,296	19,378	20,674	6.3%	1,236	18,401	19,637	6.3%

"The outage may be denied if it jeopardizes system reliability or causes congestion requiring off-cost operations." Manual 3, Page 63



PJM Congestion Status Review

- PJM makes binary determination of congestion status in transmission facility outage review
 - Yes/No only
- No review of level of congestion by MW or dollar impact.
- No indication of study where the value of the flag was created



Transmission Facility Outage Requests by Processed Status

				2020	0/2021					2021	/2022		
Received				In		Congestion	Percent			In		Congestion	Percent
Status		Cancelled	Complete	Process	Denied	Expected	Complete	Cancelled	Complete	Process	Denied	Expected	Complete
Late	Emergency	5	63	2	1	71	88.7%	7	47	0	1	56	83.9%
	Non Emergency	33	148	9	10	203	72.9%	36	158	4	22	221	71.5%
On Time	Emergency	0	2	0	0	2	100.0%	2	6	0	0	8	75.0%
	Non Emergency	213	722	68	10	1,020	70.8%	197	623	94	24	951	65.5%
Total		251	935	79	21	1,296	72.1%	242	834	98	47	1,236	67.5%

1.6 percent of outage requests were denied in 2020/2021 planning year and 3.8 percent were denied in 2021/2022 planning year

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Effectiveness of Rules (On Time or Late)

- Clear definition of on time or late rule
- No clear definition of congestion rule
- The On Time or Late status affects the priority with which PJM processes the outage request
 - 1. Emergency outage
 - 2. On time outage
 - 3. Late outage
- There is no clear rule that defines consequences of late outages





Effectiveness of Rules (Rescheduling Rule)

		Original Duration	
Revision	<=5	> 5 & <=30	>30
Entirely same month(s)	On Time	On Time	On Time
	On Time if before the first of the	On Time if before the first of the	On Time if before the first of the
Different month, nearer to	month one month prior to the	month six months prior to the	month six months prior to the
the current date	starting month of the outage	starting month of the outage	starting month of the outage
Different month, further	On Time if before the first of the	On Time if before the first of the	On Time if before the first of the
out into the future, but	month one month prior to the	month one month prior to the	month one month prior to the
same planning year	starting month of the outage	starting month of the outage	starting month of the outage
Revised Duaration >5	Re-evaluate	NA	NA
Revised Duaration >30	Re-evaluate	Re-evaluate	Re-evaluate
Different month, further	On Time if before the first of the	On Time if before the first of the	
out into the future, and	month one month prior to the	month one month prior to the	
different planning year	starting month of the outage	starting month of the outage	Re-evaluate
Adding equipment	May lose On Time status	May lose On Time status	May lose On Time status
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The on-time outage request may lose "on-time" status (Manual 3, 67)



Rescheduled and Cancelled Transmission Outage Requests

			2020/2021					2021/2022		
Planned			Percent	Approved	Percent			Percent	Approved	Percent
Duration	Outage	Approved and	Approved and	and	Approved and	Outage	Approved and	Approved and	and	Approved and
(Days)	Requests	Rescheduled	Rescheduled	Cancelled	Cancelled	Requests	Rescheduled	Rescheduled	Cancelled	Cancelled
<=5	16,125	3,552	22.0%	2,267	14.1%	15,187	3,070	20.2%	2,078	13.7%
>5 & <=30	2,969	1,688	56.9%	204	6.9%	2,872	1,500	52.2%	199	6.9%
>30	1,580	1,048	66.3%	84	5.3%	1,578	1,047	66.3%	88	5.6%
Total	20,674	6,288	30.4%	2,555	12.4%	19,637	5,617	28.6%	2,365	12.0%

Outage Ticket ID	Planned Start Date	Planned End Date	Outage Duration Status	Update Date Time	On-Time
JAIAAC	250CT2021:06:00:00	06NOV2021:18:00:00	13 Submitted	10MAR2021:08:34:49	1
JAIAAC	250CT2021:06:00:00	06NOV2021:18:00:00	13 Received	11MAR2021:14:10:05	1
JAIAAC	02NOV2021:06:00:00	16NOV2021:18:00:00	15 Revised	17AUG2021:09:30:10	1
JAIAAC	02NOV2021:06:00:00	16NOV2021:18:00:00	15 Received	18AUG2021:09:38:10	1
JAIAAC	03NOV2021:06:00:00	17NOV2021:18:00:00	15 Received	130CT2021:17:29:38	1
JAIAAC	19JAN2022:06:00:00	23JAN2022:18:00:00	5 Revised	280CT2021:15:18:57	1
JAIAAC	19JAN2022:06:00:00	23JAN2022:18:00:00	5 Received	290CT2021:09:39:18	1
JAIAAC	19JAN2022:06:00:00	23JAN2022:18:00:00	5 Approved	14JAN2022:13:03:13	1
JAIAAC	19JAN2022:06:00:00	23JAN2022:18:00:00	5 Active	19JAN2022:14:24:02	1
JAIAAC	19JAN2022:06:00:00	28JAN2022:18:00:00	10 Active	20JAN2022:09:38:08	1
JAIAAC	19JAN2022:06:00:00	02FEB2022:18:00:00	15 Active	20JAN2022:09:38:23	1
JAIAAC	19JAN2022:06:00:00	28JAN2022:18:00:00	10 Completed	28JAN2022:10:23:14	1

"Transmission Owners should avoid scheduling any outage in excess of 5 days in duration with a restoration time greater than 72 hours that may result in increased risk to system reliability during peak summer and winter periods." Manual 3, Page 66

- This example is a real outage request with a placeholder outage ticket ID.
- On October 28, 2021, the outage was moved from nonpeak period in 2021 to peak period in 2022.
- The outage would have been submitted late if it had been submitted for the first time on October 28, 2021.
- The duration was extended after the outage was active.



Outage Ticket ID	Planned Start Date	Planned End Date	Outage Duration Status	Update Date Time	On-Time
FEBCBD	29APR2019:08:00:00	23MAY2019:16:00:00	25 Submitted	12JUL2018:12:52:28	1
FEBCBD	29APR2019:08:00:00	23MAY2019:16:00:00	25 Received	13JUL2018:16:26:59	1
FEBCBD	27APR2020:08:00:00	21MAY2020:16:00:00	25 Revised	11DEC2018:15:30:14	1
FEBCBD	27APR2020:08:00:00	21MAY2020:16:00:00	25 Received	12DEC2018:12:40:06	1
FEBCBD	27APR2020:08:00:00	21MAY2020:16:00:00	25 Approved	23APR2020:13:02:30	1
FEBCBD	26APR2021:08:00:00	20MAY2021:16:00:00	25 Received	27APR2020:17:02:12	1
FEBCBD	01JUN2021:08:00:00	25JUN2021:16:00:00	25 Revised	31MAR2021:15:02:19	1
FEBCBD	01JUN2021:08:00:00	25JUN2021:16:00:00	25 Received	01APR2021:15:01:49	1
FEBCBD	01JUN2021:08:00:00	25JUN2021:16:00:00	25 Cancelled by Company	18MAY2021:08:28:32	1

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- This example is a real outage request with a placeholder outage ticket ID
- The outage was included in the June 2021 FTR model
- The FTR auction opening date was May 11, 2021, and the closing date was May 13, 2021
- The outage was cancelled on May 18, 2021, after the close of the FTR auction.
- The reason for the cancellation was not shown in the outage audit table and PJM comments in the audit table were blank.



Outage Ticket ID	Planned Start Date	Planned End Date	Outage Duration Status	Update Date Time	On-Time Equipment Type
FEAAAG	13APR2020:08:00:00	06AUG2020:16:00:00	116 Submitted	23JUL2019:13:27:26	0 BRKR
FEAAAG	13APR2020:08:00:00	06AUG2020:16:00:00	116 Received	24JUL2019:14:37:24	0 BRKR
FEAAAG	10APR2020:16:30:00	06AUG2020:16:00:00	119 Revised	17MAR2020:13:03:51	0 LINE
FEAAAG	13APR2020:11:00:00	06AUG2020:16:00:00	116 Revised	01APR2020:16:03:04	0 LINE
FEAAAG	20APR2020:11:00:00	13AUG2020:16:00:00	116 Received	09APR2020:17:49:16	0 LINE
FEAAAG	20APR2020:11:00:00	13AUG2020:16:00:00	116 Approved	16APR2020:13:41:12	0 LINE
FEAAAG	20APR2020:11:00:00	13AUG2020:16:00:00	116 Active	20APR2020:12:19:59	0 LINE
FEAAAG	20APR2020:11:00:00	24SEP2020:16:00:00	158 Active	29JUL2020:10:59:21	0 LINE
FEAAAG	20APR2020:11:00:00	24OCT2020:16:00:00	188 Active	08SEP2020:14:09:38	0 LINE
FEAAAG	20APR2020:11:00:00	06NOV2020:16:00:00	201 Active	15OCT2020:13:45:27	0 LINE
FEAAAG	20APR2020:11:00:00	20NOV2020:16:00:00	215 Active	200CT2020:12:40:04	0 LINE
FEAAAG	20APR2020:11:00:00	24NOV2020:16:00:00	219 Active	18NOV2020:13:23:02	0 LINE
FEAAAG	20APR2020:11:00:00	10DEC2020:08:00:00	235 Active	24NOV2020:16:37:28	0 LINE
FEAAAG	20APR2020:11:00:00	11DEC2020:16:00:00	236 Active	09DEC2020:08:36:22	0 LINE
FEAAAG	20APR2020:11:00:00	10DEC2020:08:00:00	235 Completed	10DEC2020:12:28:44	0 LINE





- This example is a real outage request with a placeholder outage ticket ID.
- The outage duration was increased from 116 days to 235 days.
- The duration was increased after the outage was active.
- The outage was submitted late, but approved and completed.



Outage Selection Process



Annual FTR Market Modeled Transmission Facility Outage Requests by Received Status

2020/2021					2021/2022			
				Percent of				Percent of
Planned Duration	On Time	Late	Total	Total	On Time	Late	Total	Total
<2 weeks	76	12	88	27.4%	86	13	99	27.0%
>=2 weeks & <2 months	88	13	101	31.5%	128	16	144	39.2%
>=2 months	104	28	132	41.1%	93	31	124	33.8%
Total	268	53	321	100.0%	307	60	367	100.0%

2021/2022 Total outage request = 19,637 Modeled = 367/19,637 = 1.9 Percent



Annual FTR Market Modeled Transmission Facility Outage

		2020/2	021	2021/20	2021/2022		
		Outage		Outage			
Planned Duration	Processed Status	Requests	Percent	Requests	Percen		
<2 weeks	In Progress	5	5.7%	11	11.1%		
	Denied	0	0.0%	1	1.0%		
	Approved	0	0.0%	0	0.0%		
	Cancelled	27	30.7%	27	27.3%		
	Revised	0	0.0%	0	0.0%		
	Active	0	0.0%	0	0.0%		
	Completed	56	63.6%	60	60.6%		
	Total	88	100.0%	99	100.09		
>=2 weeks & <2 months	In Progress	7	6.9%	28	19.49		
	Denied	0	0.0%	1	0.79		
	Approved	1	1.0%	0	0.09		
	Cancelled	26	25.7%	29	20.19		
	Revised	0	0.0%	1	0.79		
	Active	0	0.0%	0	0.0%		
	Completed	67	66.3%	85	59.0%		
	Total	101	100.0%	144	100.0%		
>=2 months	In Progress	14	10.6%	10	8.19		
	Denied	0	0.0%	0	0.09		
	Approved	0	0.0%	3	2.49		
	Cancelled	23	17.4%	25	20.29		
	Revised	0	0.0%	0	0.09		
	Active	2	1.5%	3	2.49		
	Completed	93	70.5%	83	66.99		
	Total	132	100.0%	124	100.09		
Total Cancelled		76	23.7%	81	22.19		
Grand Total		321		367			
onitoringanalytics	.com	23			22		



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Annual FTR Market Modeled Transmission Facility Outage Requests

• 81 of 367 FTR modeled transmission outages were canceled for planning year 2021/2022.



Transparency and Effectiveness of FTR Auction Outage Selection Process

- The term "impactful" is not clearly defined.
- Reasons for the number of included outages are not clear (only 1.9 percent of outages included).
- The selection process includes manual process that does not apply transparent rules.
- Congestion expected criterion is used without considering magnitude of the outage.



Conclusion

- Transmission outage submission, review and scheduling rules should be strengthened.
- Consequences for violations of the rules should be defined.
- Transmission outage selection process for FTR model should more clearly defined and transparent
- Congestion costs should be calculated for both outage scheduling and outage selection for FTR model.
- PJM should consider rules requiring local Transmission Owner to take local control in the case of disruptive transmission outages, e.g. Northern Neck outages.



Solutions

- The MMU recommends that PJM reevaluate all transmission outage tickets as on time or late as if they were new requests when an outage is rescheduled, and apply the standard rules for late submissions to any such outages.
- The MMU recommends that PJM draft a clear definition of the congestion analysis required for transmission outage requests to include in Manual 3 after appropriate review.



Solutions Cont.

- The MMU recommends that PJM modify the rules to reduce or eliminate the approval of late outage requests submitted or rescheduled after the FTR auction bidding opening date.
- The MMU recommends that PJM not permit transmission owners to divide long duration outages into smaller segments to avoid complying with the requirements for long duration outages.



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