

### **RASC RAN Phase 3 Capacity Accreditation (RASC010) (20190807)**

- **What pros/cons do stakeholders see for the capacity accreditation options?**
- **Which option(s) provide the best incentives to improve availability?**

The OMS Resources Work Group (OMS RWG) believes that MISO needs to address the seasonal construct before changes to capacity accreditation are made. Seasonality will allow for flexibility to more easily avoid short-term capacity accreditation impacts. Once a seasonal construct is implemented, the OMS RWG would support the “Effective Outage Rates” option that would treat every outage as an outage, regardless if it was forced, planned, or due to maintenance. This would incentivize resources to be available during the seasons they clear the PRA (when they are counted on to meet the Planning Reserve Margin Requirement) and schedule maintenance/planned for seasons they do not, as failing to do so would impact the capacity accreditation for their facility. The OMS RWG is open to receiving more information on the “Real-time availability for all resources” option and its potential impacts to capacity accreditation. The OMS RWG does not support the “Retroactive Performance Evaluation” option.

- **Are there certain options that may be more easily attained under a seasonal construct?**

The “Effective Outage Rates” option would be more palatable under a seasonal construct.

- **Are there other options MISO should be considering?**

The OMS RWG has no feedback on this question at this time.

- **How should MISO align LOLE assumptions for each of the capacity accreditation options?**

The OMS RWG believes that, for purposes of the LOLE study, MISO should model outages that most closely reflect reality as possible. The LOLE study should not use the idealized assumption that planned outages are not scheduled during the summer season when, in reality, that is not what is happening. The OMS RWG is open to suggestions on the best way to achieve this, including proposals to study the last several years of actual planned outage behavior and using that historical rolling average in the LOLE study as a basis for planned outages.

### **RASC Proposal for Replacement of PRA Cleared Resources with LT Planned Outage (20190807)**

- **Are the “right” long-term outages being targeted by this proposal?**

MISO’s draft proposal for PRA Qualification and Replacement for Long-Term Planning Outages consists of two categories:

- 1) Resources expected to be unavailable for the minimum of the first 90 days of the PY shall not qualify for participation in the PRA, and
- 2) Cleared resources with planned outages lasting at least 90 days to replace or be penalized at CONE

MISO's current PRA focuses on procuring the necessary resources to meet the Planning Reserve Margin Requirement for the summer peak for the upcoming PY. As such, the OMS RWG believes that MISO should focus solely on the first category of outages. This would prevent the issue of resources clearing the PRA while being on planned outage for vast majority of the PY and penalize resources taking planned outages during the peak summer months. The OMS RWG is open to proposals on ways to prevent "gaming" by generation going on planned outage just outside the window (starting a planned outage on the second day of the PY instead of the first). One possible idea would be to change the proposal to disqualify from the PRA any resource that is on planned outage for X% of the first 90 days of the PY.

MISO's RAN Phase I filing on outage coordination should be sufficient to address resource adequacy and planned outages after the first 90 days of the PY in the short term until a seasonal construct (with seasonal capacity accreditation) can be implemented.

- **Are the replacement requirements and penalties appropriately defined?**

The OMS RWG believes that the penalty for the planned outage during the first 90 days of the PY (disqualification from the PRA) is appropriate and clear. The OMS RWG takes no position on the requirements/penalties for the proposed planned outage window outside of the first 90 days of the PY.

- **Understanding this proposal is an incremental step toward a more comprehensive solution. What other factors should be considered in:**
  - **The "step 1" incremental proposal, and**
  - **The longer-term complete solution to be developed through the RAN effort?**

The OMS RWG believes that Step 1 (Targeting the 2020/21 PRA) should focus solely on preventing a resource from being on planned outage for the vast majority of the PY, and doing so within the current capacity construct. Resolving resource adequacy issues outside of the peak summer season should be reserved for Step 2 (RAN Phase III-Targeting 2021/22+ PRA).