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| **Date** | August 28, 2015 |
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| **Submitter’s Information** | |
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| **Market Segment** | Investor Owned Utility (IOU) |
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| **Comments** |

CenterPoint Energy has participated in the meetings of the OCITF and recognizes the effort of the various market participants in developing the report. These proposed changes to the Outage Coordination process could have a significant impact on Transmission Service Providers’ outage coordination and transmission construction efforts. Therefore, CenterPoint Energy offers the following comments on the proposed changes.

**Proposal 1)** – Identification of High Impact Outages (HIOs)

CenterPoint Energy comments: CenterPoint Energy supports Proposal 1. The current process ERCOT uses for determining HIOs is not transparent, nor is a list of HIOs available for any market participant to review. Likewise, the rate of success of ERCOT in predicting HIOs using their current process was shown in 2014 to have been less than desirable. All of these reasons demonstrate the need for improving the identification of HIOs. Significant work still has to be done, by an as yet to be identified working group, to establish the criteria for identifying HIOs.

**Proposal 2)** – Providing Advanced Feedback for Planned Transmission Outages

* + Option A
  + Option B

CenterPoint Energy comments: Of the two choices, Option A is likely the better choice. However, without protection of planned transmission outages from generation outages within the 90 day window (Proposal 4) and better documentation of original submittal dates (Proposal 5), it is CenterPoint Energy’s view that Proposal 2 will do little to improve some of the issues related to outages that are submitted less than 90 days in advance. CenterPoint Energy would recommend moving forward with Proposals 1, 4, and 5 in some order before pursuing Proposal 2.

**Proposal 3)** – Use of the High Impact Outage List as a screening tool in the <90-day processes

* + Option A
  + Option B
  + Option C
  + Option D

CenterPoint Energy comments: CenterPoint Energy recommends either Option A or B as a first step towards using the newly created HIO list (Proposal 1) to improve the length of time HIOs are scheduled. CenterPoint Energy is opposed to Options C and D as they could reject outages needed for necessary upgrades to the transmission system. There are legitimate reasons why a planned outage may be submitted within the 90 day window; for example, revisions in a construction plan or finalization of the construction schedule of a complex, multi-facility project. Implementation of Options C or D could result in rejection of a needed outage, likely for a reliability upgrade, for a non-reliability reason.

**Proposal 4)** – Protection of Planned Outages (or subset of HIOs) submitted with more than 90-days’ notice

* + Option A
  + Option B

CenterPoint Energy comments: CenterPoint Energy recommends implementing either Option A or Option B of Proposal 4. Securing and protecting an approved TSP Planned Outage from being bumped by a generator outage submitted within the 90 day window would be the most important improvement identified by the OCITF. This is one of the reasons why so many TSP planned outages have to be moved around with little notice.

**Proposal 5)** – Introduction of Rescheduled Outage Type

CenterPoint Energy comments: CenterPoint Energy recommends implementing Proposal 5. Currently the ERCOT Outage Scheduler requires TSPs to cancel a planned outage and request a new one, but this new request does not retain the original submittal date. This is one of the primary reasons why the metrics for TSP planned outages show a poor number of outages scheduled more than 90 days in advance. The planned outage was submitted more than 90 days out, but any movement of that outage loses this information. Proposal 5 attempts to remedy that situation and reclassify the outage when it has to be moved, yet retains the original submittal date.