Merchant Alert Protocol (MAP)

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Introduction

This review was assigned by the RRC in the summer of 2023, for a report in the fall. It was initially believed that the purpose was to discuss the history of the Merchant Alert Protocol (hereinafter MAP) with Andy Meyers. This was done and reported out in the fall of 2023. But, it seemed at that time like more info was needed, and that need has evolved into this document.

Brief History

A handful of things changed when WECC RC evolved to Peak RC. The messaging system was one of those changes. BPA (at least BPA, possibly others) saw a need for some of the messaging functionality to continue, and worked with OATI to replace the WECC RMS for merchants (can't recall exactly what this was called, but it was something like this).

Functionality was put into OASIS for folks to post MAPs when Peak became the RC. When that changed to RC West, more work had to be done by OATI to effectuate the change. That work was done alongside some OASIS work that Idaho Power was doing. It is believed Idaho Power was compensated by WECC for including MAP requirements in the work they were doing. WECC did not (maybe still does not) have a contractual relationship with OATI to request work directly from them, but paid for the work thru the Market Interface Committee (MIC).

The messages now go through CAISO's GMS and get sent to all who have requested messages. Link to sign up for messages is here: <u>Subscribe to RC West area alerts</u>

There may have been some issues in late summer 2023, when at least one entity was unable to post a MAP. Apparently, a new required drop-down field had been added indicating which RC the requesting merchant is in. Note, there is a draft of proposed changes to the MAP guideline that is being submitted with this report, which captures this additional field and has some other proposed edits (eg., changing references from Peak to RC West and MIC to RRC).

SPP RC considered using the tool, but I'm told their members decided against it, so they do not use the tool. However, it sounds like they might post MAP requests on behalf of entities in their area that do not have access to OASIS?

One of the questions being asked about the MAP was whether or not folks were using the functionality.

The MAP guideline itself calls for the MIC to review it every 2 years. Since the revision block hasn't been updated, it is believed this might be the first review for the document, which is dated from 2019.

Analysis

In the last year, there have been several MAPs posted. One in August 2023. An entity might have had trouble posting, so perhaps there could have been more if the instructions were corrected. There were three (3) posted in January 2024, during the cold weather event.

The four (4) noted here as actual MAP requests for assistance, are in addition to multiple 'test' ones that have been posted.

At the WECC Board meeting last month, RC West presented on the January 2024 event. It was noted that two (2) entities require a MAP request prior to posting an EEA. BPA is one of those entities. While its not always possible to make a MAP request prior to an EEA, and procedures acknowledge that steps can be taken out of order, there is still some value to continuing the MAP guideline/procedure as it is more of a forward type assessment.

BPA's internal MAP request procedure calls for a MAP to be made at least 2 hours before an EEA is anticipated to be needed. Thus, it is an additional warning step that could prevent the declaration of an EEA. Also, since it is trying to anticipate an emergency (or prevent one), the forecast nature of it seems to partially support NERC's BAL-007/008 effort to look for these problems prior to becoming emergencies. And to take steps to solve them prior to dealing with them as emergencies.

The WECC guideline needs to be updated to reflect a new required field in the form, and to clean up some legacy changes from Peak RC to RC West and MIC to RRC. A word version of the guideline, with the proposed edits, is included with this submission.

Risks

There are some risks associated with the MAP guideline. No one owns the OATI code, which could become non-functional if no one is testing it with OATI updates. It may

be part of OATI's regression testing, but since no one owns it, validation would need to come from OATI and they are typically tightlipped around their code.

Entities do not appear to test, per the guideline spec. BPA does test posting MAPs, but we don't always hit the frequency required.

Several folks at BPA (myself included) did not receive the notices in January. Apparently, we had been removed from RC West's notification tool/list. While that has been corrected, purging or removing names from that list has risk to missing notifications (not just MAP requests, but EEA's and loop flow notices, also).

Conclusion

MAPs should continue to exist.

The MAP guideline should be updated. Suggested changes are included in a version attached to this report.

The RRC should assign a group to review this guideline every 2 years.