

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



Order Instituting Rulemaking to
Oversee the Resource Adequacy
Program, Consider Program Reforms
and Refinements, and Establish
Forward Resource Adequacy
Procurement Obligations

Rulemaking 25-10-003

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**OPENING COMMENTS OF THE CALIFORNIA ENERGY STORAGE ALLIANCE ON
TRACK 1 PARTY PROPOSALS**

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March 6, 2026

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The California Energy Storage Alliance (“CESA”) hereby submits these Opening Comments on parties’ Track 1 proposals (“Proposals”) pursuant to the Assigned Commissioner’s Scoping Memo and Ruling issued on December 12, 2025, and as modified in the Administrative Law Judge’s Ruling on Energy Division’s Transactability Report and Modifying Track 1 Schedule issued on February 24, 2026.

I. INTRODUCTION

CESA appreciates the opportunity to provide the following comments on the Track 1 Party Proposals:

- Comments on Energy Division’s Unforced Capacity (“UCAP”) proposal
 - CESA supports Energy Division’s principles-based approach to UCAP outage selection and recommends additional clarifying principles.
 - Including foldback limitations in the UCAP calculation would be a double-penalty and could have serious reliability consequences.

- Assessing resources during the Availability Assessment Hours (“AAHs”) could over- and under- represent each resource’s contribution to reliability.
- CESA supports many of AES’s UCAP proposals.
- CESA finds the Vistra UCAP proposal comprehensive and well-considered. CESA recommends the Commission open a dedicated discussion or workshop in Track 2 to further discuss the outage types Vistra highlights, and appropriate treatment under the UCAP methodology.
- CESA is supportive of Energy Division’s and Vistra’s energy storage QC clarifications, but with some important further clarifications. CESA supports the development of storage-specific concepts and terminology that allow for more accurate evaluation of both short- and long-term energy storage resources and encourage the addition of the proposed parameters to the Master Resource Database. Energy Division should consider further developing energy storage resource parameter definitions through a workshop in Track 2.
- Conveying the solar exceedance QC value to the CAISO may result in unanticipated and undue deliverability status downgrades.

II. UCAP DISCUSSION

A. Comments on Energy Division’s UCAP Proposal

i. CESA Supports Energy Division’s Principles-Based Approach to UCAP Outage Selection and Recommends Additional Clarifying Principles

The Energy Division’s (“ED”) UCAP proposal enumerates several UCAP principles, which CESA supports. While they are not comprehensive, these principles are ones with which

we agree, particularly that the UCAP implementation should incentivize the procurement of more effective and reliable resources and that unit outage types that indicate unplanned equipment failure should be incorporated in the forced outage rate. However, the ED proposal still does not propose a clear forced outage definition to be used for UCAP purposes nor does it provide the comprehensive framework regarding how the UCAP values would be used within the RA framework. CESA,¹ AES,² and Vistra³ have discussed the need for the Commission to adopt a clear and principled definition for “forced outage” that distinguishes between equipment failure and those dispatch limitations present when the resource is functioning normally. In the case of Vistra’s proposal, Vistra also proposed that the clear and principled definition would include outages that reflect use limitations, which CESA does not support and asks the Commission to exclude from the principled definitions for applicable forced outages.

A principles-based forced outage definition is beneficial for energy storage, as a relatively new resource type with novel modeling challenges for CAISO, but it also benefits the market overall, incentivizing good resource management practices in the existing resource fleet and allowing new resource types to provide resource adequacy appropriate to individual unit characteristics regardless of the status of CAISO’s market design. Storage design and modeling updates in the CAISO system may solve current accreditation concerns for energy storage resources, but the Commission should consider that technological advances will likely result in similar market design challenges in the future, applying to resources not yet commercially available. A principles-based forced outage definition allows a durable framework for evaluating

¹ CESA February 10-11, 2026, Workshop Presentation on the UCAP Methodology and CESA Track 3 Proposals, R.23-10-011 at Section II.c.2.

² AES Track 1 Proposals, R.25-10-003 at 3, Section III.A (Regulatory Definitions for Forced Outages).

³ Vistra Track 1 Proposals, R.25-10-003 at Page 22-24, Section III.C.

new resource characteristics, and it allays concerns about arbitrary and unfair discrimination between resource types.

Energy Division proposes the following principles:

- Implementing UCAP into the RA program should incentivize LSEs to procure more effective and reliable resources
- Unit outage types that indicate unplanned equipment failure that impacts the performance or availability of a resource to provide future capacity should be included in the forced outage rate.
- Unit outage types should be consistent between resource accreditation for RA and the inputs used for RA LOLE modeling (used in the development of PRMs), so the efforts are consistent.
- To support the reliability modeling, the forced outage rate will exclude derates for temperature because it will be calculated separately.
- To be consistent with the 1-in-2 load forecast, a typical weather year will be used to calculate a separate set of hourly weather-normalized derations due to ambient temperature.
- To the extent possible, the data will rely on publicly available data.
- Per Commission guidance in D.25-06-048 the preference is for UCAP to be applied on a unit-specific basis.
- The Commission supported using the best three out of the last four years of outage data.

- This will account for force majeure or highly unusual events that occurred in the past and may not be expected to occur in the future. Therefore, the exclusion of nature of work codes from the UCAP calculation should be very limited.

CESA proposed that a forced outage should be defined as unplanned equipment failure that renders the resource unable to provide capacity consistent with its certified operating parameters. Energy Division's UCAP principles should be expanded to include the following:

- **The forced outage rate used to determine the UCAP value should be comparable across resource classes.** This principle ensures the methodology provides an accurate and equitable representation of each resource's contribution to reliability. Comparability is critical because, without it, the methodology risks creating disparate treatment between resource types, leading to certain resources inequitably receiving higher accreditation values. This is particularly true where resource accreditation, which should focus on equipment failures leading to loss of capability, accidentally incorporates limitations stemming from market design deficiencies rather than resource failure.
- **The forced outage rate used to determine the UCAP value should not reflect outages used to ensure an accurate dispatch of a resource operating within its design specifications.** This principle recognizes that all types of resources are available to the CAISO within their design specifications. If CAISO happens to dispatch resources into known operating limitations due to deficiencies in its market/resource modeling, suppliers should not be penalized for expressing these limitations to the CAISO through the submittal of an outage card. Many of these types of limitations are currently directly modeled by CAISO for some resource

types, but not all, causing potential disparate treatment between resource types if this principle is not maintained. Penalizing resources for submittal of such outages is a consequence of deficiencies in CAISO's market/resource modeling, these outages are a direct result of the way in which the CAISO dispatch algorithm happened to drive the resource in the past (which will be different in the future), no amount of maintenance can be performed to avoid these outages in the future, and once the CAISO market/resource model matures there will not be associated outages to assess in the future.

- **The forced outage rate used to determine the UCAP value should not reflect outages that are outside of management control.**⁴ The UCAP value should not reflect outages that are completely outside of management control, such as limitations imposed by the transmission system or gas pipeline availability, as the generator itself remains fully available and capable of responding to a CAISO dispatch. These outages have nothing to do with the resource capabilities and no amount of maintenance can be performed to avoid these outages in the future. Including curtailments or outages due to circumstances wholly outside the resource owner's control—such as transmission system limitations or gas pipeline limitations—dilutes the performance incentive inherent in UCAP and potentially penalizes resources for systemic issues, rather than unit reliability. The generator is fully available and capable of responding to a CAISO dispatch in such cases.

⁴ If the effect of outages that are outside of management control are so large as to present a reliability challenge, it is more appropriate to include them in the determination of the RA program's Planning Reserve Margin ("PRM"), the costs of which would be borne by all load-serving entities, rather than penalizing individual LSEs that have contracted with resources experiencing events that are driven by the broader system and would not be improved by better maintenance activities.

The attached table illustrates the difference between the Energy Division’s proposals for a UCAP-applied forced outage and the CESA principles from a CAISO nature-of-work field perspective (*See Attachment*). Certain existing nature-of-work fields do not currently distinguish among some outages that would be treated differently under the outage selection principles. This should not deter the Commission from seeking clear regulatory principles and rationales for outage categorization. CESA,⁵ AES⁶ and Vistra⁷ proposed an approach that would allow Energy Division staff to presume an outage classification based on default nature-of-work assumptions but also allow suppliers and load-serving entities to offer attestation supporting outage reclassification referencing Commission-defined principles/definitions in a consultation process.

The Energy Division proposal’s treatment of storage foldback illustrates the importance of a clear forced outage definition. Energy Division’s proposal suggests that the storage outages due to foldback should be included in the unit’s UCAP calculation, which violates its own principles (that UCAP should reflect unplanned equipment failure) and is inconsistent with its treatment of other resources. The foldback period is the period when a battery charges or discharges more slowly as it approaches full charge or zero charge. This is a normal and expected physical constraint in battery resources, comparable to startup and Pmax limitations in other types of resource. The Energy Division takes the position that foldback should be treated as a forced outage on the basis that this inherent operational constraint could contribute to a lack of capacity. However, this potential lack of capacity is not due to equipment failure and therefore should not be reflected in the UCAP value. As discussed later, any potential lack of capacity caused by

⁵ CESA Track 1 Proposal, Section II.d, “Proposal to Establish a Data Validation and Operator Review Process”, pg. 14.

⁶ AES Track 1 Proposal, Section III.c.1, “Data Validation and Operator Review Process”, pg. 8.

⁷ Vistra Track 1 Proposal, Section III.C, stating the Commission should “adopt a process to allow for a consultation between RA suppliers, Commission Staff, and CAISO to validate their resource-specific values are accurate representations of their forced capacity.”

foldback is already accounted for in the battery's underlying QC calculation if the Commission adopts the QC clarifications filed by Vistra and Energy Division.

The Energy Division proposal acknowledges that CAISO operating model limitations may contribute to batteries operating in the foldback region, yet it still proposes to penalize resources for it. It also acknowledges that CAISO's instructions are to report foldback as Plant Trouble, rather than as a resource parameter, and then suggests that this designation makes it impossible to distinguish foldback from true outages. In practice, the nature of the foldback period makes it easy for operators to identify Plant Trouble periods in which foldback is being reported. There is no maintenance or technical improvement that storage operators can make to prevent the CAISO from operating a battery within its foldback region, so there is no maintenance activity to incentivize. Energy Division's proposed treatment would merely penalize storage for operating within its design specifications.

The Energy Division proposal leaves Commission Effective Forced Outage Rate in demand ("EFORd") calculations vulnerable to market operator design decisions, jeopardizing the Commission's ability to ensure the UCAP methodology allows equitable comparison among resource types. UCAP should not depend on how CAISO happens to represent a constraint in its modeling architecture. If foldback is treated as a forced outage when represented through outage cards, but as a generation constraint when represented through Master File or Master Resource Database parameters, the Commission's ability to fairly evaluate resource reliability becomes dependent on the speed of the CAISO market design process and the quality of its bridging mechanisms.

ii. Including Foldback Limitations in the UCAP Calculation Would be a Double-Penalty and Would Have Serious Reliability Consequences

The Energy Division proposal dismisses concerns related to double-counting foldback limitations by asserting that outage reports reflect operational rather than capacity issues and therefore will not impact UCAP. That framing is incorrect for storage resources. Foldback should already be reflected in a battery's qualifying capacity ("QC") value because RA accreditation is based on sustained deliverable output over the required duration (e.g., four continuous hours). To the extent a unit cannot maintain its nameplate output for the full duration due to predictable tapering near minimum or maximum state of charge, its RA capacity should be reduced accordingly. Vistra,⁸ Energy Division, and CAISO filed proposals that would clarify the storage QC so that all QCs are established consistent with this principle, which CESA supports.

If, after being accredited at this reduced level, the resource is then instructed to submit a Plant Trouble outage card whenever it enters a predictable foldback zone, thereby reflecting the same physical tapering a second time, any inclusion of those outage hours in EFORd (and thus UCAP) reduces accredited capacity below the level already determined to be sustainably deliverable. This double-penalizes storage: once through reduced qualifying capacity and again through forced-outage treatment, even though no equipment failure has occurred. Because foldback periods are not counted as QC, they should not be penalized for UCAP.

Energy Division's proposal would have a predictable negative reliability impact: since the RA accreditation is based on a four-hour consistent discharge (uninhibited by discharge foldback) and the Availability Assessment Hours ("AAHs") consist of a five-hour window, a storage resource delivering at its maximum RA capacity during a high-load period would be pushed into the foldback period by hour 5. The formula for QC accreditation makes this unavoidable. At the

⁸ Vistra Track 1 Proposal, Section II.

beginning of hour 5, the resource still has available energy to provide to the grid, although at a lower rate.

UCAP is intended to measure unplanned forced outages, not predictable and already-accredited operating characteristics. Including foldback hours in EFORD would distort that metric and artificially suppress accredited capacity.

Furthermore, Energy Division's UCAP proposal would directly disincentivize storage resources from offering their foldback energy into the market during the precise periods in which that energy is most needed to avoid forced-outage classifications. The storage operator must choose between submitting an outage card for Plant Trouble⁹ to offer additional energy to the grid and withholding its remaining energy to preserve its UCAP accreditation value. This is bad for reliability, and it pushes resource operators towards strategic bidding to benefit capacity accreditation, which carries significant regulatory risks.¹⁰

iii. Assessing Resources During the Availability Assessment Hours Could Over- and Under- Represent Each Resource's Contribution to Reliability

The Energy Division proposal examines the potential misalignment between AAHs and actual risk hours in its discussion of demand response resources but does not examine the impact of this misalignment on energy storage resources. Energy Division's proposal to use the AAHs may result in some resources appearing to be excellent performers due to an "inflated denominator" when in reality, at the times that they are needed most, they would otherwise have a higher forced outage rate. Furthermore, if other resources were on forced outage at a time when

⁹ Following current CAISO guidance

¹⁰ FERC Office of Enforcement and Regulatory Accounting consistently opens investigations into resources that make strategic supply offers to preserve their capacity accreditation (see, e.g., 2025 Report on Enforcement pg. 25.)

they would not have been dispatched, those resources would inaccurately appear to have a worse contribution to reliability.

CESA¹¹ and Vistra¹² provided proposals to better align outage assessment hours to when resources are in-demand. CESA's proposal links hour selection criteria to unit economics, while Vistra's proposal targets the hours onto days where full resource capacity is more likely to be in demand. CESA acknowledges that some parties are not yet comfortable with its proposal due to uncertainties, implementation complexities, and not yet having results data to review. CESA recommends Energy Division provide results following the CESA proposal to enable a more robust party review of the various ways to target in-demand hours. Furthermore, CESA's proposal expressed an openness to Vistra's variation on Energy Division's AAH approach that limits the AAH assessment period to the top 10 net load days in each month.¹³

B. Comments on AES's UCAP proposals

CESA supports many of AES's proposals¹⁴ related to UCAP Data Quality and Implementation, which harmonize with the CESA's proposal.¹⁵ AES highlights data issues related to failure to omit SOC-related outages from UCAP calculations of storage resources in compliance with the Commission's Decision (D.) 24-12-003, double-counting curtailments affecting hybrid solar-plus-storage resources, and inaccurate or limited underlying data used to calculate class-average UCAP values. Vistra's proposal echoed the same data issue concerns as well.¹⁶ CESA shares Vistra's and AES's concerns and urges the Commission to adopt a structured and

¹¹ CESA Track 1 Proposals, R.23-10-011 Section II.C (Proposal to Assess Energy Storage Resource Outages Only During Times That They Would Reasonably Have Been Dispatched By CAISO).

¹² Vistra Track 1 Proposals, Section III.C

¹³ CESA Track 1 Proposal, pgs. 13-14.

¹⁴ AES Track 1 Proposals

¹⁵ CESA Track 1 Proposals, R.25-10-003 at 3, Section II.C.

¹⁶ Vistra Track 1 Proposals, Section III.C, Page 24.

transparent data review process that allows resource operators to correct inaccuracies prior to the finalization of UCAP calculations. CESA supports Vistra’s proposal that the data review, called “consultation process” in Vistra’s proposal, occur in between preliminary values being published and final values being published proposing for a 2028 implementation those occur by Q3 2026 and Q1 2027, so the final UCAP values are known with sufficient lead time for LSEs and suppliers to adjust while minimizing market friction.¹⁷

AES’s proposed UCAP refresh mechanism for new and upgraded resources solves a significant reliability problem. A resource with an established UCAP value that undertakes repairs or retrofits to improve its reliability is still assessed according to previous years’ performance, even when that performance is no longer an accurate reflection of the resource’s capacity value. The same problem exists when new resources inherit poor class-average UCAP numbers from previous-generation resources with lower reliability. Mispricing the capacity value of resource retrofits or upgrades will distort investment incentives for such upgrades, leading to a less reliable resource fleet.

AES proposed that new resources in resource classes with data quality problems should be transitioned to UCAP values reflecting their own reliability after a year and that augmented or retrofitted resources should be permitted to reset their UCAP upon producing documentation of significant reliability investment. Allowing resources to demonstrate improved reliability could permit the market to compensate successful retrofits while continuing to penalize resources that do not improve their performance. CESA is interested in this proposal because it could resolve a

¹⁷ *Id* at Page 25.

serious issue for some resources, but feels the proposal could benefit from further discussion in Track 2.

C. Comments on Vistra’s Energy Storage UCAP Proposals

Vistra reiterates¹⁸ a point CESA has raised in the past:¹⁹ that the ability of an energy storage resource to provide its full QC value may be constrained by other types of equipment failure. An outage or de-rate of the Pmax is the most commonly discussed failure, but operational energy may also be impacted by outages or de-rates of a resource’s Pmin, MaxCEL and MinCEL, as in the case of inverter or rack outage or state-of-charge safety limits. The Vistra proposal includes an appendix describing potential points of failure specific to battery storage resources. In CESA’s view, parties should explore the extent to which a resource-specific UCAP should incorporate this information. CESA recommends the Commission open a dedicated discussion or workshop in Track 2 to further discuss the outage types Vistra highlights, and appropriate treatment under the UCAP methodology.

III. CURRENT QC CALCULATION CLARIFICATIONS

A. Comments on Energy Division’s QC Calculation Clarifications

CESA mostly agrees with the QC calculation clarifications provided in ED’s proposal C, which appear to be consistent with the Commission’s determination in D.14-06-050. Taking the difference between MAX_CONT_ENERGY_LIMIT and MIN_CONT_ENERGY_LIMIT and dividing by four is an appropriate interim step until ED staff can access unit-specific foldback information or expand the QC calculation to recognize varying durations. Since charging foldback

¹⁸ Vistra Track 1 Proposals, Section III.C

¹⁹ CES Track 31 Proposals, R.23-10-011 pg. 8, Section II.C (Straw Proposal).

at the upper limit of charge does not impact the resource while discharging, Energy Division must clarify the language in their proposal designating a MaxCEL unaffected by foldback to specify that this is the maximum continuous energy unaffected by *discharge* foldback.

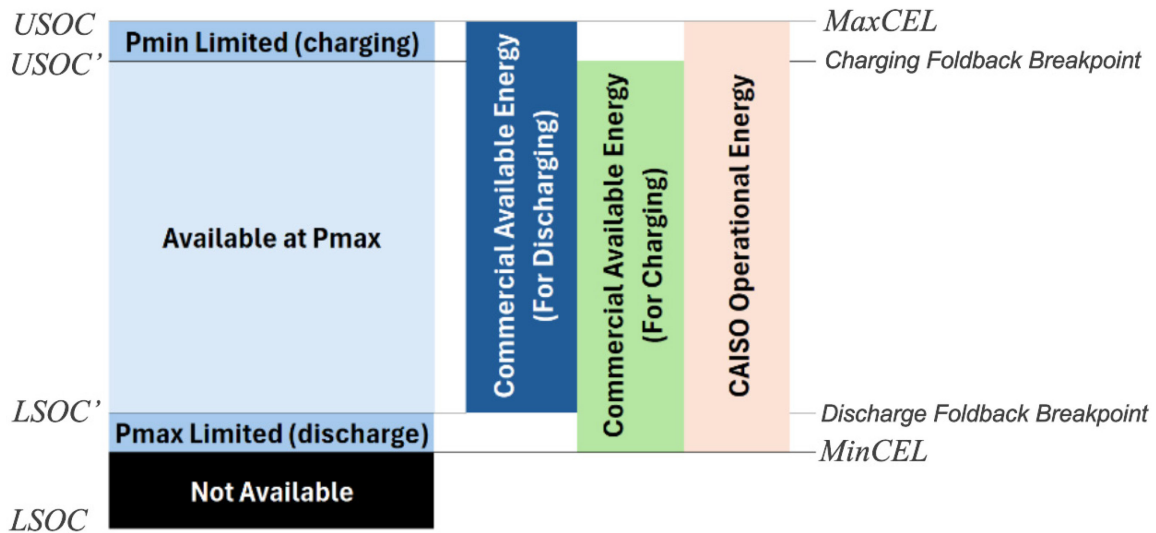
B. Comments on Vistra’s QC Calculation Clarifications

Vistra’s proposal lays out the basis for the QC calculation of storage resources with admirable clarity and detail, including a discussion of QC calculation for LDES resources. CESA agrees with Vistra’s notion that a “contracted duration” (or minimum run hours per cycle) should inform the QC value, as Vistra describes. Energy Division’s proposal also recommends adding this additional field to the MRD representing the storage resource durations in hours even though the ED proposal falls short of proposing to use this new field to calculate QCs based on resource durations per cycle.²⁰

CESA supports the development of storage-specific concepts and terminology that allow for more accurate evaluation of both short- and long-term energy storage resources and encourages the addition of the proposed parameters to the Master Resource Database. However, CESA recommends parties consider ensuring that the default use of the 0.1 and 0.9 factors in the calculation of the Commercial Available Energy (for RA) do not infringe on the existing policy for continuous discharge dispatch capability. This value should not implicate the charging foldback region, because the charging foldback region does not prevent a storage resource from providing discharge at full Pmax. CESA recommends further discussion around an accurate and appropriate definition for these fields in Track 2 of this proceeding.

²⁰ CPUC Energy Division Track 1 Proposal at Page 14.

Vistra’s proposal suggests that the QC-qualifying discharge be limited to the storage resource’s available energy between the upper and lower foldback breakpoints, as represented by the light blue portion of the illustration below (*USOC’-LSOC’*). CESA recommends that the appropriate QC-qualifying discharge should instead be the available energy between the MaxCEL and the lower foldback breakpoint, or the dark blue bar labeled “Commercial Available Energy (For Discharging).” Because the upper foldback area does not impact the speed of discharge, it need not be excluded from QC-qualifying resource energy. The appropriate calculation for the resource’s QC should be $\frac{MaxCEL-LSOC'}{Minimum\ Run\ Hours\ per\ Cycle}$.



Ultimately, clear definitions for the various energy storage parameters must be developed and discussed in this proceeding. Parties could benefit from a more detailed discussion in Track 2, as there may be more parameters that must be defined.

IV. CONVEYING THE SOLAR EXCEEDANCE QC VALUE TO THE CAISO MAY RESULT IN UNANTICIPATED AND UNDUE DELIVERABILITY STATUS DOWNGRADES

MN8 highlights an issue with the current practice where Energy Division conveys solar exceedance values to the CAISO as QC in paired configurations.²¹ CESA is primarily concerned that the new practice of conveying the higher exceedance values as QC results in deliverability status downgrades and may cause contractual problems for developers and investors. This may also impair a developer's ability to expand deliverable energy storage at paired resource locations.

CESA notes that, because solar exceedance calculations under Slice-of-Day have been significantly higher than prior ELCC calculations, developers of hybrid resources are encountering an unexpected penalty, in the form of a deliverability status downgrade with potential contracting implications. Prior to the Slice-of-Day framework, a hybrid resource with a 100 MW POI might have 100 MW of nameplate solar capacity and a 15% ELCC, leading to a 15 MW QC. Based on this number, the hybrid resource would install an 85 MW paired storage resource. Since the deliverable energy is 100 MW through the POI, the paired storage would have 85 MW FCDS and the paired solar would have 15 MW FCDS.

Under Slice-of-Day rules, the same resource is assigned a 70% solar exceedance value. Because 70 MW is significantly higher than the 15 MW of the POI allotted to the paired solar, the 15 MW of deliverability status associated with the solar is downgraded to PCDS while the 85 MW of paired storage maintains 85 MW FCDS.

As a result, resources that previously had FCDS for the entire value of their POI are facing deliverability status downgrades despite no change in resource deliverability, and solar resources

²¹ MN8 Track 1 Proposal

in the process of adding storage, where it was not fully developed before, find themselves unable to obtain FCDS, which may prevent or slow project development. Deliverability status downgrades may cause contractual problems for developers and investors.

It is not yet clear to CESA whether the Commission must alter the QC value it submits to CAISO or CAISO must alter its deliverability process, but this is clearly an issue. CESA recommends the Commission to further explore this CAISO coordination issue in Track 2.

V. CONCLUSION

CESA appreciates the opportunity to submit these opening comments on Track 1 party proposals and looks forward to further developments in this proceeding to enhance the Commission's RA program.

Respectfully submitted,

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ATTACHMENT

Table comparing the UCAP treatment of CAISO Nature of Work Codes under the Energy Division proposal and under CESA’s principles

Nature of Work Code	Description	Included by Energy Division Proposal	Included by CESA
AMBIENT_DUE_TO_FUEL_INSUFFICIENCY	Ambient due to Fuel insufficiency	Yes	Yes
AMBIENT_DUE_TO_TEMP	Ambient Due to Temperature	Not in UCAP, but impacts QC	Not in UCAP, but impacts QC
AMBIENT_NOT_DUE_TO_TEMP	Ambient Not Due to Temperature	Yes	Yes
ANNUAL_USE_LIMIT_REACHED	Annual use limit reached	Yes	No
AVR_EXCITER	AVR/Exciter	Yes*	Yes
ENVIRONMENTAL_RESTRICTIONS	Environmental Restrictions	Yes	No
ICCP	Inter-Control Center Communications Protocol (ICCP)	Yes	Yes
METERING_TELEMETRY	Metering/Telemetry	Yes	Yes
MONTHLY_USE_LIMIT_REACHED	Monthly use limit reached	Yes	No
MSS_RESERVABLE	Metered Subsystem Reservable	Yes*	Yes
NEW_GENERATOR_TEST_ENERGY	New Generator Test Energy	No	No
OTHER_USE_LIMIT_REACHED	Other Use Limit reached	Yes	No
PLANT_MAINTENANCE	Plant Maintenance	Yes	Yes
PLANT_TROUBLE	Plant Trouble	Yes	Only when representing true equipment failure. Outages representing foldback do not impact UCAP.
POWER_SYSTEM_STABILIZER	Power System Stabilizer	Yes*	Yes
RAMP_RATE	Ramp Rate	Yes*	No
RIMS_OUTAGE	Resource Interconnection Management System Outage	Yes	No
RIMS_TESTING	Resource interconnection Management System Testing	Yes	No

RTU_RIG	Remote Terminal Unit	Yes	Yes
SHORT_TERM_USE_LIMIT_REACHED	Short term use limit reached	Yes	No
TECHNICAL_LIMITATIONS_NOT_IN_MARKET_MODEL	Technical Limitations not in Market Model	Yes	No
TRANSITIONAL_LIMITATION	Transitional Limitation	Yes	No
TRANSMISSION_INDUCED	Transmission Induced	No	No
UNIT_SUPPORTING_STARTUP	Unit Supporting Startup	Yes*	No
UNIT_TESTING	Unit Testing	Yes*	No

* Not observed in historical data