

153 FERC ¶ 61,088
FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

October 26, 2015

In Reply Refer to:
California Independent System
Operator Corporation
Docket No. ER15-2204-001

Alston & Bird LLP
The Atlantic Building
950 F Street, NW
Washington, DC 20004

Attn: Mr. Bradley R. Miliauskas, Esq.

Reference: Petition for Limited Waiver

Dear Mr. Miliauskas:

1. On September 14, 2015, the Commission issued an order accepting for filing, effective September 15, 2015, tariff amendments filed by the California Independent System Operator Corporation (CAISO) revising CAISO's validation process for self-schedules supported by existing transmission rights and transmission ownership rights.¹
2. On September 15, 2015, CAISO filed a petition (September 15 Petition) for a limited tariff waiver to modify the effective date of the self-schedule validation process tariff revisions approved in the September 14 Order. In the September 15 Petition, CAISO requests that the Commission suspend the effectiveness of the self-schedule validation process tariff revisions until October 27, 2015. CAISO explains that it planned to implement the tariff revisions as part of its 2015 fall software release, which was then scheduled for September 15, 2015. However, CAISO states that the 2015 fall software release has been postponed until October 27, 2015. CAISO indicates that the delayed

¹ *Cal. Indep. Sys. Operator Corp.*, 152 FERC ¶ 61,195 (2015) (September 14 Order).

implementation date will allow it to address concerns raised by the Commission regarding CAISO's pending Energy Imbalance Market year one enhancements that are also included in the 2015 fall software release.²

3. CAISO argues that good cause exists to grant the waiver because it is of limited scope as it would only apply for six weeks. CAISO states that the waiver would address a concrete problem that needs to be remedied because the tariff revisions cannot go into effect until the 2015 fall software release is implemented as the software needed to implement the tariff revisions must be bundled with the other software enhancements to be included in the 2015 fall software release.³ Lastly, CAISO contends that the waiver has no undesirable consequences because the existing tariff provisions regarding the validation process for self-schedules supported by existing transmission rights and transmission ownership rights are in effect today and will remain so until the new tariff provisions are implemented.⁴ CAISO notes that the waiver effectively maintains the status quo while allowing it to implement the tariff revisions as expeditiously as possible.⁵

4. Notice of CAISO's filing was published in the *Federal Register*, 80 Fed. Reg. 57,164 (2015), with protests and interventions due on or before October 6, 2015. None was filed.

5. We will grant CAISO's unopposed petition to permit the tariff revisions the Commission previously accepted to be suspended until October 27, 2015. We agree with CAISO that the 2015 fall software release should remain bundled. Consistent with the factors the Commission has considered in evaluating requests for waivers of tariff provisions,⁶ we agree with CAISO that the request for waiver is limited in scope, will allow CAISO to address concerns raised by the Commission regarding the CAISO's

² See CAISO deficiency letter response, Docket No. ER15-1919-002, at 2 (Aug. 21, 2015).

³ September 15 Petition at 1, 3.

⁴ *Id.* at 3.

⁵ *Id.* at 3-4.

⁶ See, e.g., *New York Indep. Sys. Operator, Inc.*, 136 FERC ¶ 61,156, at PP 5, 7 (2011); *Southwest Power Pool, Inc.*, 135 FERC ¶ 61,032 at P 12; *Southwest Power Pool, Inc.*, 138 FERC ¶ 61,200, at P 5 (2012).

pending Energy Imbalance Market year one enhancements that are also included in the 2015 fall software release, and no party will be harmed by the request. For these reasons, we grant CAISO's petition, as discussed herein.

By direction of the Commission.

Kimberly D. Bose,
Secretary.