

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

City of Tacoma, Department of)	
Public Utilities, Light Division)	Docket No. EL24-87-000
d/b/a Tacoma Power)	
v.)	
)	
California Independent System)	
Operator Corporation)	

**ANSWER OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION TO COMPLAINT**

The California Independent System Operator Corporation (CAISO) submits its answer to the complaint filed in the above-captioned proceeding by the City of Tacoma, Department of Public Utilities, Light Division d/b/a Tacoma Power (Tacoma) on March 13, 2024.¹

I. Answer

Tacoma’s March 13 complaint appeals a tariff-required sanction of \$8,000 related to late corrections of meter data values for the November 1, 2022 through November 8, 2022 trading days. This complaint is substantially similar to complaints Tacoma filed in docket numbers EL23-103, EL24-14, EL24-25, and EL24-65. Aside from the affected trading days, the underlying issues in all of the complaints are similar. The complaints involve Tacoma’s appeal of penalties defined in the CAISO tariff for making late revisions to self-reported meter data.

¹ The CAISO files this answer pursuant to Rule 213 of the Federal Energy Regulatory Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.213.

According to Tacoma, the late revisions were needed to correct meter data that initially was incorrect because of Tacoma's inadvertent application of a transmission loss factor to the reported meter data.

The CAISO filed answers in the previous dockets explaining the CAISO supports relief for parties such as Tacoma that have established they are exposed to inequitable penalties under the existing tariff rules.² That position applies equally to the complaint in this docket. Given that the Commission already has granted Tacoma the requested relief in those other dockets, the CAISO urges the Commission to grant this penalty appeal.³

II. Communications

Under Rule 203(b)(3) of the Commission's Rules of Practice and Procedure, the CAISO respectfully requests that service of all pleadings, documents, and all communications regarding this proceeding be addressed to:

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Operator Corporation
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² *City of Tacoma v. Cal. Indep. Sys. Operator Corp.*, Answer to Complaint, at 2, FERC Docket Nos. EL24-65-000 (Feb. 15, 2024); *City of Tacoma v. Cal. Indep. Sys. Operator Corp.*, Answer to Complaint, at 2, FERC Docket Nos. EL24-25-000 & EL24-14-000 (Nov. 30, 2023); *City of Tacoma v. Cal. Indep. Sys. Operator Corp.*, Answer to Complaint, at 3, FERC Docket No. EL23-103-000 (Oct. 30, 2023).

³ *City of Tacoma v. Cal. Indep. Sys. Operator Corp.*, 186 FERC ¶ 61,229 (2024).

III. Conclusion

Consistent with the position it has taken in response to prior Tacoma complaints, the CAISO supports Tacoma's request to excuse the meter data sanction at issue in the above-captioned complaints.

/s/ David S. Zlotlow

Roger E. Collanton
General Counsel

Andrew Ulmer

Assistant General Counsel

David S. Zlotlow

Lead Counsel

California Independent System
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250 Outcropping Way

Folsom, CA 95630

Counsel for the California Independent
System Operator

Dated: April 2, 2024

CERTIFICATE OF SERVICE

I certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California this 2nd day of April, 2024.

/s/ Ariana Rebancos

Ariana Rebancos

An employee of the California ISO