



May 5, 2023

The Honorable Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

**Re: California Independent System Operator Corporation**

**Informational Filing of Effective Date of Washington WEIM  
Greenhouse Gas Compliance Tariff Amendment**

**Docket No. ER23-474-\_\_\_\_**

Dear Secretary Bose:

On November 21, 2022, the California Independent System Operator Corporation (CAISO) proposed a tariff amendment to allow in-state Washington resources to reflect the costs of greenhouse gas (GHG) compliance associated with Washington's cap-and-invest program in their default energy bids and commitment costs. By order issued February 10, 2023, the Commission accepted the tariff revisions, subject to a compliance filing, and directed the CAISO to submit an informational filing to inform the Commission of the actual effective date within five (5) business days of implementation.<sup>1</sup>

The CAISO implemented the tariff changes for the Washington WEIM GHG initiative on May 1, 2023. Accordingly, the CAISO is submitting this informational filing to specify an effective date of May 1, 2023 for the tariff revisions accepted by the Commission in this docket, as well as for the supplementary compliance filing tariff records.<sup>2</sup>

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<sup>1</sup> *Cal. Indep. Sys. Operator Corp.*, 182 FERC ¶ 61,067 (2023). The Commission directed the CAISO to notify the Commission of the actual effective date of the Tariff revisions within five business days of their implementation, in an eTariff submittal using Type of Filing Code 150 – Report. The CAISO also filed a compliance filing correcting a typographical error on March 13, 2023. The Commission accepted the revisions by order issued April 20, 2023. Letter Order, ER23-474 (Apr. 20, 2023).

<sup>2</sup> Specifically, this informational filing updates the effective date for all Tariff Records submitted in this filing on November 21, 2022, except for tariff section 30.4.5 that was revised in the compliance

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To implement the tariff changes as soon as possible, the CAISO is manually incorporating the most recent Washington allowance auction price into the fuel price component of the reference levels for certain fuel regions relevant to Washington generating resources. The CAISO tariff contemplates use of an allowance auction price until there are two indices reflecting a greenhouse gas price for Washington. Currently, only one such index exists.

The CAISO continues to work on market system changes necessary to calculate a greenhouse gas allowance price for Washington generating resources based on two published indices. To the extent that the CAISO believes it will be unable to support that functionality once two published indices are available, the CAISO will request a limited waiver to allow it to continue to utilize the most recently available auction price.

The CAISO has served copies of this filing on all the parties to the service list for this proceeding. In addition, the CAISO is posting this filing on the CAISO website.

If there are any questions concerning this filing, please contact the undersigned.

Respectfully submitted,

**By: /s/ Sarah E. Kozal**

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## 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 5th day of May, 2023.

*/s/ Jacqueline Meredith*

Jacqueline Meredith  
An employee of the California ISO