

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

City of Tacoma, Department of)	
Public Utilities, Light Division)	Docket No. EL24-65-000
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 January 29, 2024.¹

I. Answer

Tacoma’s January 29 complaint appeals a tariff-required sanction of \$31,000 related to late corrections of meter data values for each trading day in October 2022. This complaint is substantially similar to complaints Tacoma filed in docket numbers EL23-103, EL24-14, and EL24-25. Aside from the affected trading days, the underlying issues in all three 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. According to Tacoma, the late revisions were needed to correct meter data that initially was incorrect because

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.

of Tacoma's inadvertent application of a transmission loss factor to the reported meter data.

The CAISO filed an answer in docket number EL23-103 on October 30, 2023, and filed an answer in docket numbers EL24-14 and EL24-25 on November 30, 2023. The CAISO answers explained 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. The CAISO's October 30 and November 30 filings also requested the Commission consider granting relief for all trade dates affected by the inaccurate loss factor issue that created the penalties.³ The CAISO respectfully reiterates that request.

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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² *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 *Id.*

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

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Counsel for the California Independent
System Operator

Dated: February 15, 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 15th day of February, 2024.

/s/ Ariana Rebancos

Ariana Rebancos

An employee of the California ISO