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.

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. 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.

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:

David S. Zlotlow
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California Independent System Operator Corporation
250 Outcropping Way
Folsom, CA 95630
Tel: (916) 351-4400
Fax: (916) 608-7222
Email: dzlotlow@caiso.com

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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 Operator Corporation
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