August 27, 2021

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20246

Re: California Independent System Operator Corporation
Errata Filing of the Energy Storage and Distributed Energy Resources Phase 4 – Tariff Revisions

Docket No. ER21-2779-___

Dear Secretary Bose:

On August 27, 2021, the California Independent System Operator Corporation (“CAISO”) filed in this proceeding a tariff amendment to implement the fourth phase of the CAISO’s energy storage and distributed energy resource stakeholder initiative (“ESDER”).\(^1\) This tariff amendment consisted of three distinct sets of tariff revisions: (1) creating biddable state-of-charge parameters for energy storage, (2) applying market power mitigation and creating default energy bids for energy storage, and (3) enabling demand response resources to reflect maximum daily run times.\(^2\) Together, these enhancements will optimize the performance of storage and demand response resources and improve the CAISO’s markets.

In this initial filing, the CAISO erroneously requested a FERC Order as of October 26, 2021, which is less than 61 days from filing. The CAISO intended to request a FERC Order issued by October 28, 2021, which would be 61 days from the date of filing.

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\(^1\) The CAISO submits this filing pursuant to section 205 of the Federal Power Act (“FPA”), 16 U.S.C. § 824d.

\(^2\) Each set of tariff revisions is severable. The CAISO has filed them together for administrative efficiency, because they resulted from the ESDER initiative, and the CAISO will implement them simultaneously. See CAISO Final Proposal on ESDER Phase 4, available at http://www.caiso.com/InitiativeDocuments/FinalProposal-EnergyStorage-DistributedEnergyResourcesPhase4.pdf.
For the reasons described above, the CAISO respectfully requests that the Commission accept the CAISO’s proposed tariff revisions in this proceeding on or before October 28, 2021. As described in the CAISO’s filing, the CAISO requests an effective date no later than December 1, 2021. This will provide the CAISO and market participants sufficient time to prepare for implementing these changes. The CAISO requests authorization to notify the Commission of the effective date of the tariff changes within five days of implementation.

Respectfully submitted,

By: /s/ William H. Weaver  
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Dated:  August 27, 2021
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 27th day of August, 2021.

/s/ Jacqueline Meredith
Jacqueline Meredith