

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

**California Independent System) Docket No. ER15-1825-000
Operator Corporation)**

**MOTION FOR LEAVE TO ANSWER AND ANSWER OF THE CALIFORNIA
INDEPENDENT SYSTEM OPERATOR CORPORATION TO ANSWERS**

The California Independent System Operator Corporation (“CAISO”) moves for leave to answer and files its answer to the answers submitted by the Northern California Power Agency (“NCPA”) and City of Santa Clara, California (“SVP”) on July 22, 2015, in response to the CAISO’s July 7, 2015, answer in this proceeding. The CAISO agrees that the two categories of tariff changes noted by NCPA and SVP are needed and requests that the Commission direct the CAISO to make them on compliance.

First, NCPA and SVP argue that the CAISO should revise its tariff to specify the applicability of the revised resource adequacy tariff provisions to load-following metered subsystems. Upon further consideration of the issue, the CAISO agrees that such tariff revisions are needed, although given other amendments to section 40 of the tariff, achieving the desired result may require a more complex solution than simply reinstating the prior language from section 40.1.1. The CAISO proposes to consult with NCPA and SVP (and any other stakeholders that express an interest) in preparing the tariff revisions to submit on compliance.

Second, NCPA and SVP assert that the CAISO’s July 7 answer, while seeming to agree with their arguments that tariff section 40.10.5.1.1(2) requires

clarification to prevent double counting of variable energy resources, mistakenly inverted those arguments. NCPA and SVP are correct about both the CAISO's agreement that clarification is needed and the erroneous inversion of their arguments in the July 7 answer. The CAISO proposes to consult with NCPA, SVP, and any other stakeholders that express an interest before the CAISO submits tariff revisions on compliance to prevent double counting of variable energy resources.

Respectfully submitted,

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Dated: August 6, 2015

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all of the parties listed on the official service list for the above-referenced proceeding, 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 Washington, DC this 6th day of August, 2015.

/s/ Bradley R. Miliauskas
Bradley R. Miliauskas