

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

Filing Requirements for Electric Utility
Service Agreements Electricity Market
Transparency Provisions of Section 220 of
the Federal Power Act Revisions to Electric
Quarterly Report Filing Process Electric
Quarterly Reports

RM01-8-000; RM10-12-000;
RM12-3-000, ER02-2001-000

**COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

The California Independent System Operator Corporation (CAISO) files these comments in response to the Commission’s Proposed Revisions to Electric Quarterly Report (EQR) Reporting Requirements issued on September 22, 2016. In its notice, the Commission solicits comments on proposed revisions and clarifications to EQR reporting requirements. Among other revisions, the Commission’s notice proposes to require transmission providers to report ancillary services transaction data as part of EQR Reporting Requirements. The notice states, in part, that the Commission currently requires transmission providers to report only information about their ancillary services agreements in the Contract Data section [of the EQR] if the contract provides for the sale of the ancillary services product.”¹ The notice proposes to require transmission providers to report information about transactions made under their ancillary services agreements in the Transaction Data section of the EQR.²

¹ *Filing Requirements for Electric Utility Service Agreements Electricity Market Transparency Provisions of Section 220 of the Federal Power Act Revisions to Electric Quarterly Report Filing Process Electric Quarterly Reports*, Notice Seeking Comments on Proposed Revisions to Electric Quarterly Report Reporting Requirements RM01-8-000 *et al.* (Notice Seeking Comments) (September 2016) at P 8.

² *Id.*

The Commission's notice does not explicitly state whether its proposal would apply to Regional Transmission Operators or Independent System Operators and, if so, how. First, the notice does not discuss the fact that RTO/ISOs already make significant information available to the Commission under Order 760³ and make non-proprietary ancillary service transaction data available to the public on their open access same time information systems (OASIS). Second, the notice does not explain how there is inadequate visibility into the actual sales and rates being charged for ancillary services when those sales clear through a market operator. The Commission's notice proposes that transmission providers report ancillary services information in the transaction data section of the EQR, but does not explain how RTO/ISOs can fulfill this reporting function when ancillary services are subject to a market clearing process, and the RTO/ISO allocates the costs of ancillary services procurement to market participants.

Pursuant to Order 760, the CAISO provides all ancillary service market awards on a resource level for each of its markets and the associated ancillary service marginal price.⁴ In addition, for ancillary services, the CAISO posts on OASIS ancillary service clearing prices, hourly information on ancillary services requirements, and operating reserves the CAISO market procures.⁵ This information provides adequate visibility into ancillary service transactions within the CAISO's markets, including the actual sales and

³ *Enhancement of Electricity Market Surveillance and Analysis through Ongoing Electronic Delivery of Data from Regional Transmission Organizations and Independent System Operators*, 139 FERC ¶ 61,053 (Order 760) (2012)

⁴ *Id.* at P 57.

⁵ See generally <http://oasis.caiso.com/mrioasis/logon.do>

rates for ancillary services.⁶ Accordingly, the CAISO requests that the Commission clarify that the proposed EQR filing requirements for ancillary services do not apply to RTOs/ISOs because they would duplicate requirements that already apply to RTOs/ISOs under Order 760, and the RTO/ISOs already make the requested non-proprietary information available to the public on OASIS. Alternatively, the CAISO requests that the Commission clarify that RTO/ISOs may satisfy the proposed EQR requirements by demonstrating that they make ancillary service transactions data available to the Commission and the public through other means and do not need to submit similar data through the EQR database.

Dated: December 6, 2016

Respectfully submitted,

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⁶ Cf. Notice Seeking Comments at P 8, which states in part: "Although transmission providers currently report information about their ancillary services agreements, without information about the transactions taking place under those agreements, there is inadequate visibility into the actual sales and rates being charged for ancillary services, especially where transmission providers have increased their reliance on markets to meet their ancillary services obligations."

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 captioned 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 Folsom, California this 6th day of December 2016.

Anna Pascuzzo
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