

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

**California Independent System            )           Docket No. ER16-\_\_\_\_-000**  
**Operator Corporation                    )**

**PETITION FOR LIMITED WAIVER OF TARIFF PROVISIONS**

The California Independent System Operator Corporation (CAISO) respectfully requests a temporary suspension of the effectiveness, or limited waiver, of the limitation on timing for price corrections in section 35.2 of the CAISO tariff. This tariff provision requires that price corrections for a trading day end no later than three business days after the trading day for the day-ahead market and five business after the trading day for the real-time market.<sup>1</sup> The CAISO seeks this waiver to correct prices for various pricing locations and market intervals in the period between October 15, 2014 and April 30, 2015. Due to several interrelated system issues experienced in the first seven months of implementation of the CAISO's expanded full network model and the Energy Imbalance Market (EIM), certain prices posted on the CAISO's OASIS are either based on data errors or are otherwise inconsistent with the tariff.

The CAISO became aware of potential issues approximately two weeks after it implemented the EIM and immediately began analyzing the root causes of, and investigating potential solutions for, the observed system issues to prevent their

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<sup>1</sup> Section 29.35 of the CAISO tariff grants the CAISO up to ten business days to make corrections to real-time market prices during the first 90 days after a new entity joins the EIM. Section 35.3 of the CAISO tariff also permits the CAISO to make corrections for up to 20 business days where the changes are to remedy processing and publication issues. Neither of these exceptions to the standard deadline alters the need for this waiver.

recurrence. After extensive analysis and problem solving, the CAISO identified and implemented all solutions for prospective market runs effective May 1, 2015. The CAISO was not at that time, however, able to determine exactly how each market interval was affected by the multiple issues it suspected at that time also affected the quality of the price calculations. After the CAISO implemented the prospective solutions, the CAISO focused its efforts on analyzing the past market runs and prices and resolving identified pricing issues prior to the eighteen-month recalculation settlement statement so the CAISO could minimize the time for resettlement based on corrected prices. The CAISO has now completed its analysis and is prepared to execute the price corrections to ensure the ultimate prices for that first seven-month period are not affected by the system issues experienced after implementing the FNM and EIM.

Good cause exists for the Commission to grant this request, and the waiver is consistent with Commission precedent. The system errors occurred in the context of two significant market software and modeling enhancements, were not apparent from market simulation and testing, and were not made in bad faith. The waiver is limited in scope to defined pricing records, which represent less than half a percent of the pricing records generated during the relevant period. Granting the waiver will enable the CAISO to correct the posted prices and recalculate settlements consistent with those corrections in a timely manner. The waiver also prevents undue market harm because, if left uncorrected, the errors disproportionately would impact a small group of market participants.

If the Commission grants the requested waiver, the CAISO will reflect the corrections in the upcoming scheduled recalculation settlement statements for the relevant trading days.<sup>2</sup> A Commission order granting the requested waiver by April 18, 2016, will allow the CAISO to correct the prices on OASIS and process such price changes in its settlement system in time to meet the April 25 publication deadline for the first of the relevant eighteen-month recalculation settlement statements.<sup>3</sup>

If the Commission grants the requested waiver after April 18, then the CAISO will only be able to reflect some of the corrections in the thirty-five month recalculation settlement statement for the affected trading day, rather than the eighteen-month statement.<sup>4</sup> The most significant recalculations, dollar-wise, begin with the October 25, 2014, trading day. A Commission order by April 27, 2016 (*i.e.*, the 61<sup>st</sup> day after today), would allow the CAISO to reflect the recalculation for that trading day (and subsequent trading days) on the eighteen-month recalculation settlement statement, thus allowing

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<sup>2</sup> As explained in more detail below, the CAISO was unable to prepare the proposed price corrections in time for them to be included in the nine-month recalculation settlement statement. The next regularly scheduled recalculation settlement statement is the eighteen-month statement, which is the recalculation settlement statement on which the CAISO seeks to reflect the corrections. After the eighteen-month statement, the next recalculation statement would be published at thirty-five months. The CAISO does not believe it is appropriate to wait until thirty-five months after the trading day to make the identified corrections.

<sup>3</sup> The CAISO needs a minimum one-week lead time because it would be processing corrections from an archival system that was not designed for re-processing of price corrections and requires more time to process a high volume of corrections. Because these corrections will be incremental to adjustments identified previously for re-settlement, additional time is required to apply the corrections (including energy accounting), publish, calculate settlement statements, and validate the results.

<sup>4</sup> As an example, if the Commission grants the requested waiver on April 21, 2016, the CAISO would not be able to reflect any relevant price corrections for the October 15, 16, and 17, 2014, trading days until the thirty-five-month recalculation statement, rather than the eighteen-month recalculation settlement statement, but the corrections for the October 18, 2014, trading day and all trading days thereafter would be reflected in the eighteen-month recalculation settlement statement.

the CAISO to correct the most significantly impacted trade dates at the earliest practicable time.

## **I. Background**

### **A. Full Network Model Expansion and Energy Imbalance Market Implementation**

The CAISO's full network model (FNM) "is a detailed network model used in the ISO's market processes [that] reflects the interconnected power system of the ISO controlled grid and certain parts of the external grid. The ISO uses the full network model to create the base market model that the ISO uses in operating the ISO energy and ancillary services markets in order to ensure that market outcomes are consistent with actual flows on the transmission grid."<sup>5</sup>

On October 15, 2014, the CAISO implemented an expanded FNM that used an expanded scope of sources and sinks in external balancing authorities. Based on this expansion, the topology of the CAISO's FNM now includes internal and external schedules and CAISO prices appropriately reflect flows throughout the integrated Western Interconnection.<sup>6</sup>

FNM expansion was, in part, a necessary prerequisite for implementing the EIM. The EIM, which commenced on November 1, 2014, provides balancing authority areas in the Western Interconnection the opportunity to participate in the real-time market for imbalance energy the CAISO operates in its own balancing authority area.<sup>7</sup>

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<sup>5</sup> *Cal. Indep. Sys. Operator Corp.*, Tariff Amendment to Implement Modeling Enhancements, at 3, FERC Docket No. ER14-2017 (May 22, 2014).

<sup>6</sup> *Id.* at 3-4.

<sup>7</sup> *Cal. Indep. Sys. Operator Corp.*, 147 FERC ¶ 61,231 (2014).

## **B. CAISO Efforts to Analyze Price Issues Arising from FNM Expansion and EIM Implementation**

Approximately two weeks after implementing the EIM, the CAISO understood, based on customer disputes and the CAISO's own market analytic efforts, that there were potential errors with some of the prices the CAISO was calculating and posting. Although the CAISO had a general understanding that there were problems, to determine how each interval was affected and what the correct price should have been, it was necessary for the CAISO to analyze carefully the problems that caused the errors and the causal relationships to other price-processing issues. Once it became clearer to the CAISO that there were issues with some of the posted prices and the prices used in settlements, the CAISO informed market participants of the issues it had identified, and continued to analyze the market intervals to find prospective solutions and understand what price corrections might be necessary for those market intervals already cleared and posted.<sup>8</sup>

The CAISO implemented some of the solutions within the tariff-defined timeframes for price corrections. During the relevant period, the CAISO timely processed approximately 6.4 million price corrections for PNodes and approximately

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<sup>8</sup> For example, the CAISO issued a March 2, 2015, technical bulletin, which is available at the following link: [http://www.aiso.com/Documents/TechnicalBulletin\\_PricingLogicforSchedulingPoint-TieCombination.pdf](http://www.aiso.com/Documents/TechnicalBulletin_PricingLogicforSchedulingPoint-TieCombination.pdf), describing the scheduling point/intertie combination pricing issues. On February 24, 2016, the CAISO published a revised version of that technical bulletin with additional analysis including estimated market impact assessment. The revised technical bulletin is available at the following link: [https://www.aiso.com/Documents/RevisedTechnicalBulletin\\_PricingLogicforSchedulingPoint-TieCombination.pdf](https://www.aiso.com/Documents/RevisedTechnicalBulletin_PricingLogicforSchedulingPoint-TieCombination.pdf). Additionally, at the January 27, 2016, Market Planning and Performance Forum, the CAISO presented stakeholders additional details about the likely scope of this filing. The presentation from that Forum is available at [http://www.aiso.com/Documents/Agenda-Presentation-MarketPerformance-PlanningForum-Jan27\\_2016.pdf](http://www.aiso.com/Documents/Agenda-Presentation-MarketPerformance-PlanningForum-Jan27_2016.pdf).

500,000 price corrections for scheduling point/intertie combinations.<sup>9</sup> However, for some of the market intervals spanning the October 15, 2014, to April 30, 2015, period, the CAISO could not determine precisely whether the posted prices were incorrect and, if so, what exactly it needed to do to correct those prices. Because of the complexity of the issues, data processing challenges, the fact that some of the issues impacted other issues and required careful management in processing, and the need to focus on resolving the issues so that prospectively posted and corrected prices were not affected by the issues, the CAISO could not correct all the prices within the timeframe permitted under the tariff.

Once the CAISO was confident that all of the price-related issues were resolved prospectively, CAISO staff began determining how to resolve the issues retrospectively to October 15, 2014. Because multiple issues potentially affected each interval, the CAISO needed to form an interdisciplinary team comprised of market and software design subject matter experts, settlements system experts, and market analysis experts, in addition to the price correction experts that normally analyze and resolve such issues.

After extensive analytical efforts by the interdisciplinary team, the CAISO finally was able to identify the posted prices that merit correction. Because the CAISO knows now that there are material impacts if the posted prices are not corrected, the CAISO

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<sup>9</sup> Section 35.6 of the CAISO tariff calls for the CAISO to post a weekly summary of price corrections on its website. The compiled weekly reports for 2015 and 2014 are available at the following links: <https://www.caiso.com/Pages/documentsbygroup.aspx?GroupID=0283AE13-60FF-44A8-ACC7-DD9647718857>; <https://www.caiso.com/Pages/documentsbygroup.aspx?GroupID=5FE7385B-A20C-43EE-8691-F91EC03E6AAD>. Review of the weekly reports reflect that market participants had some level of transparency as to SP/TIE price issues and that some of these issues were addressed within the tariff-defined price correction timeframe.

now requires a Commission waiver to correct such prices and ensure market settlements are consistent with posted prices as required by the CAISO tariff.

Based on its investigation of the pricing errors, the CAISO is confident these problems stem from implementation issues surrounding EIM and FNM expansion and are not tied to design issues. Rather, the issues arose because implementing those two projects significantly changed underlying data structures and altered business processes, and the changed structures and processes in turn resulted in prices that were either incomplete or erroneous. The CAISO has taken measures to mitigate for these types of issues in future market enhancements and will continue to improve its processes and procedures to ensure its processing of prices are not affected by the same issues that led to the need for this request for a waiver of the CAISO price correction timeline.

## **II. Analysis of Prices Requiring Waiver to Permit Correction**

The pricing errors over which the CAISO seeks waiver authority fall into two general categories:

1. *SP/TIE price errors* – The CAISO calculated incorrect locational marginal prices for some scheduling point/intertie combinations, posted those incorrect prices to OASIS, and generated market settlements based on those incorrect prices.
2. *OASIS to Settlements Discrepancies* – The prices the CAISO posted on OASIS do not match the prices that exist in the CAISO settlements system for the same interval and location.

Between these two categories, the CAISO identified approximately 1.9 million price records for correction. Each price record requiring correction represents a locational marginal price (LMP) for a market type (day-ahead market, fifteen-minute market, or real-time market), a market interval (for the fifteen-minute and real-time

markets a fifteen-minute or five-minute interval within a particular hour), and a particular location (e.g., a specific PNode). As an example, if a system error blocked OASIS from publishing a price at one PNode for one trading day, then the CAISO would need to correct 408 separate price records just to correct the error for that one day.<sup>10</sup> The CAISO posts LMPs on OASIS for approximately 8,000 nodes. Over the 197 days of the relevant period, the CAISO thus posted approximately 643 million price records.

## **A. Analysis of Scheduling Point/Intertie Combination Price Errors**

### **1. Concept of Scheduling Point/Intertie Combination Price**

With the expanded FNM the CAISO started settling interchange schedules based on the locational marginal price (LMP) for a combination of the scheduling point and intertie. The concept behind a scheduling point/intertie combination (SP/TIE combination) LMP is that with the expanded FNM, the CAISO markets began supporting interchange schedules with external scheduling points through multiple interties. The expanded model can account for multiple interchange schedules at the same scheduling point using different interties, and even potentially interconnecting to different balancing authority areas. Interchange transactions now must specify both a scheduling point and intertie. The scheduling point is used to model the injection (for import) or withdrawal (for export) of power in the power flow solution that provides the physical flows in the FNM, which are relevant for enforcing physical limits in congestion management. The intertie, on the other hand, designates the contract path where the intertie schedule is tagged and it is relevant for enforcing scheduling limits in congestion

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<sup>10</sup> This includes a single hourly interval for each hour of the day from the day-ahead market, four intervals each hour of the day from the fifteen-minute market, and 12 five-minute intervals each hour of the day from the real-time market ( $24 \times 1 + 24 \times 4 + 24 \times 12 = 408$ ).



management. Therefore, the LMP for the SP/TIE combination for a given intertie transaction captures the marginal impact of both physical and scheduling limits. The CAISO calculates prices for approximately 110 SP/TIEs, although not all 110 of those are affected by this filing.

## **2. Identifying Errors in SP/TIE Prices**

To identify errors in SP/TIE prices, the CAISO analysis focused on analyzing the actual LMP differences at the specific SP/TIE combinations between what is posted currently on OASIS and what the CAISO has determined the price should have been. The CAISO compiled a clean data set of market price components and then, using the same logic as the market application should have used during the relevant period, derived the “correct” SP/TIE price. The CAISO then reconciled the posted prices with the recalculated prices to determine which locations had discrepancies in which intervals.

## **3. Categories of SP/TIE Errors**

The CAISO identified 1,977,471 SP/TIE price records that require correction. Table 1 reflects the eight different errors that caused the CAISO to post these nearly 2 million incorrect SP/TIE price records, showing the relative frequency of the issues over the relevant period and indicates whether the error occurred for the day-ahead market, real-time market, or both. Table 2 presents similar data but shows the issues at a monthly granularity over the relevant period.

Generally, these errors reflect that the CAISO either added something to a price it should not have added or failed to include something that should have been included. Here, the issue is not whether the rules for calculating interchange transactions

themselves were flawed or created adverse market outcomes. Instead, the errors dealt with data processing and applications.

**Table 1**

Category of SP/TIE Price Error	Price Records	Percent of Erroneous SP/TIE Records
EIMT/GHG shadow prices are not properly included in SP/TIE (RTM only)	1,928,618	97.53%
Price correction tool not synced with market rule (RTM only)	43,904	2.22%
Price fill process failure (RTM only)	2,984	0.15%
EIM shadow price erroneously included in SP-Tie output (RTM only)	988	0.05%
Flowbased congestion is not fully included in SP-Tie (DAM only)	849	0.04%
MALIN_ISL shadow price is not included in MALIN_5_N101/MALIN500 SP/TIE price (both DA and RT)	128	0.01%
	1,977,471	100.00%

**Table 2**

Category of SP/TIE Price Error	Impacted Price Records (by month)							Total
	Oct-14	Nov-14	Dec-14	Jan-15	Feb-15	Mar-15	Apr-15	
EIMT/GHG shadow prices excluded	0	100,628	695,835	503,830	444,834	182,540	951	1,928,618
Price Correction Tool unsynced	0	4,325	6,636	1,085	5,819	24,762	1,277	43,904
Price fill failure	8	30	1,689	596	285	200	176	2,984
EIM shadow price erroneously included	0	984	1	1	0	0	2	988
Flowbased congestion not fully included	0	194	0	655	0	0	0	849
MALIN_ISL shadow price is not included in MALIN_5_N101/MALIN500 SP/TIE price	33	25	23	3	2	25	17	128
	41	106,186	704,184	506,170	450,940	207,527	2,423	1,977,471

As reflected in Table 1, almost all of the SP/TIE price errors – over 97% – were related to errors in how the CAISO accounted for the EIM transfer and the EIM GHG shadow prices in calculating SP/TIE prices. The GHG shadow price is a new pricing element created as part of EIM and is used to reflect that generating units outside California do not face compliance costs of California’s state greenhouse gas regulations. The EIM transfer shadow price is used to reflect the scarcity of transfer capacity between EIM balancing authority areas. In this category of error, due to a

software issue the CAISO failed to include these two shadow prices in calculating overall SP/TIE LMPs.<sup>11</sup>

The second-most prevalent SP/TIE price error involves flaws in the price correction tool. The CAISO's price correction tool is meant to mimic the market rules. Where a price correction is warranted, the tool can recalculate what the price should have been. In several instances, however, there was a time lag between when the CAISO implemented the market rule and when it reflected those rule changes in the price correction tool. Prior to implementing the FNM expansion and EIM, the CAISO reviewed the new pricing logic and updated the price correction tools due to the system changes developed as part of these two enhancements. However, as real-time updates to the software were identified, the CAISO experienced challenges in ensuring the necessary updates to the price correction tool were made in a timely manner. Therefore, in some instances, the CAISO exercised its price correction authority within the allowable timeframe but unfortunately replaced an incorrect price with another incorrect price.

The third category of SP/TIE pricing error occurred with the price fill process. When a market run fails, the CAISO fills in the prices from the last valid market run.<sup>12</sup> For some market intervals, that process failed and filled in the wrong data for SP/TIEs.

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<sup>11</sup> In nearly all cases, this was solely a settlements issue. In other words, the posted prices are correct but the prices used for settlements were incorrect due to data management issues. In those cases, the CAISO does not require a tariff waiver of the time limitations in section 35.2 of its tariff. If the CAISO finds that the prices used in settlements are incorrect but the price as posted on OASIS is correct, the CAISO already has authority to correct settlements consistent with the prices as posted. This waiver request, therefore, is limited solely to enable the republication of prices that were rendered incorrect by the issues described herein. Once those prices are corrected, the CAISO will also correct the settlements statements through scheduled recalculation settlement statements.

<sup>12</sup> See, e.g., CAISO tariff, section 7.7.4(3)

As explained above, the SP/TIE price concept was new with the FNM expansion. Sometimes the price fill process was not configured to search for missing SP/TIE prices. In other instances, the system identified missing SP/TIE prices but filled them with the last valid price for the corresponding PNode, rather than, the SP/TIE combination price.

The next category of error involves the Mona and Crag scheduling points. In 988 market intervals, the CAISO software inadvertently calculated the price at these locations as if they were EIM locations and were assigned EIM transfer shadow prices.

In certain circumstances related to whether a scheduling limit is or is not binding, the congestion component for the SP/TIE price in the day-ahead market should be the same as the congestion component for the corresponding PNode in the day-ahead market (to reflect that the CAISO does not calculate a unique SP/TIE price for the day-ahead market). In 849 cases, however, it was not the same when it should have been. In these cases the CAISO has concluded that the SP/TIE price for the day-ahead market was incorrect and bears correction.

The final category of SP/TIE price error involves a specific SP/TIE price. For 128 price records, the CAISO failed to include the MALIN\_ISL shadow price in calculating the overall congestion in the LMP at the MALIN\_5\_N101/MALIN500 SP/TIE.

#### **4. Estimated Market Impact of Correcting SP/TIE Pricing Errors**

If the Commission grants the waiver, the CAISO will correct the incorrectly calculated prices at the nodes and days identified in the tables in Attachment A, repost the prices as corrected, and recalculate the settlement statements for all affected scheduling coordinators with the corrected prices for those intervals in which

settlements were also based on the incorrect price.<sup>13</sup> Besides Attachment A, the CAISO has posted more detailed information about the affected price records on its website.<sup>14</sup>

The CAISO estimates 62 entities would face varying degrees of settlement impact if the waiver were granted. The CAISO estimates that 38 entities would face a settlement impact (either positive or negative) of less than \$10,000 over the relevant period if the waiver were granted.<sup>15</sup> Table 3 below summarizes the estimated settlement impact to each of the 24 scheduling coordinators the CAISO estimates would face a net settlement impact (either positive or negative) over \$10,000 if the waiver were granted.<sup>16</sup> Table 3 reflects the estimated settlement impact across the EIM,<sup>17</sup> the CAISO real-time market, the CAISO day-ahead market, and congestion revenue rights process.<sup>18</sup> A positive value reflects that additional payments would be made to the

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<sup>13</sup> Specifically, Attachment A contains seven separate tables (Tables 1A-7A) for each calendar month impacted by this waiver. Each table shows a grid of SP/TIEs and trading days. A “Y” in the cell for a particular trading day for a particular SP/TIE indicates that the price for at least one market interval would be corrected for that day at that SP/TIE.

<sup>14</sup> The information is available at:  
<http://www.caiso.com/Documents/PriceCorrectionFERCWaiverDataFiles.zip>.

<sup>15</sup> The CAISO has chosen \$10,000 as a rough materiality threshold for the purpose of reporting information in Table 3 but it otherwise holds no significance in this filing.

<sup>16</sup> Because the SP/TIE price is a combination of the scheduling point price and the intertie price, corrections to the SP/TIE price may also lead to downstream settlement processing changes that ultimately result in changes to the posted price of the underlying prices of the relevant scheduling points and interties as well. Any CAISO charge code that consumes those prices accordingly would be updated on the eighteen-month recalculation settlement statement. The figures provided in this filing thus represent the CAISO’s best estimate of the settlement impacts if the Commission were to grant the requested waiver and the CAISO processed the corresponding price corrections.

<sup>17</sup> For the EIM price corrections, the ultimate changes in charges and credits will be processed to PacifiCorp and then PacifiCorp will charge or credit its customers. The estimated market impacts by party provided in this filing represent the CAISO’s best understanding of what those ultimate charges and credits are likely to be.

<sup>18</sup> Congestion revenue rights settle on the difference in the marginal cost of congestion in the day-ahead market between a source node and a sink node. The price corrections will result in changed congestion prices for some nodes that are the basis of congestion revenue rights, and thus there will be a potential impact on holders of congestion revenue rights as well.

scheduling coordinator because of the price corrections and settlements recalculations over the relevant period of trading days. A negative value reflects charges that a scheduling coordinator would face because of the corrections and recalculations. Table 3 does not identify the entities by name. Attachment B provides the complete estimate of affected parties with the names of the scheduling coordinators provided confidentially. The CAISO also has begun the process of informing scheduling coordinators of their estimated settlement impact.

**Table 3**

Market Participant	CRR	SP-TIE DAM	SP-TIE EIM	SP-TIE RTM	Grand Total
SC1	\$332,700	\$67,906	\$49,423	(\$5,229)	<b>\$444,800</b>
SC2	\$137,063	\$54,727	\$10,463	\$10,075	<b>\$212,327</b>
SC3	\$66,354	\$6,497	\$2,065	(\$3,401)	<b>\$71,514</b>
SC4	\$14,248	\$19,408	\$13,795	\$15,794	<b>\$63,244</b>
SC5	\$48,858	\$0	\$0	\$0	<b>\$48,858</b>
SC6	\$0	\$36,861	\$0	(\$431)	<b>\$36,430</b>
SC7	\$26,604	\$8,332	\$0	\$978	<b>\$35,915</b>
SC8	\$29,718	\$4,161	\$0	(\$1,250)	<b>\$32,629</b>
SC9	\$11,667	\$6,191	\$0	\$2,988	<b>\$20,846</b>
SC10	\$0	\$9,122	\$9,980	\$189	<b>\$19,292</b>
SC11	\$16,634	\$0	\$0	\$0	<b>\$16,634</b>
SC12	\$13,540	(\$0)	\$0	\$0	<b>\$13,540</b>
SC13	\$10,966	\$0	\$0	\$0	<b>\$10,966</b>
SC14	\$0	\$0	\$4,848	\$5,427	<b>\$10,275</b>
<i>SC15-SC53 have estimated settlement impact between +\$10,000 and -\$10,000</i>					
SC53	\$0	\$0	(\$12,843)	\$0	<b>(\$12,843)</b>
SC54	(\$13,670)	\$1,529	\$0	(\$3,120)	<b>(\$15,261)</b>
SC55	\$0	\$0	(\$15,515)	(\$2,934)	<b>(\$18,449)</b>
SC56	\$0	\$8,501	(\$27,859)	(\$151)	<b>(\$19,508)</b>
SC57	\$0	\$1,041	(\$23,071)	(\$53)	<b>(\$22,083)</b>
SC58	(\$26,551)	\$0	\$0	\$0	<b>(\$26,551)</b>
SC59	(\$32,646)	\$0	\$0	\$0	<b>(\$32,646)</b>
SC60	(\$51,522)	\$0	\$0	\$0	<b>(\$51,522)</b>
SC61	(\$103,390)	\$2,973	\$0	\$0	<b>(\$100,416)</b>
SC62	\$0	\$0	(\$110,245)	(\$1,717)	<b>(\$111,963)</b>
<b>Grand Total</b>	<b>\$477,880</b>	<b>\$268,912</b>	<b>(\$97,112)</b>	<b>\$17,608</b>	<b>\$667,288</b>

## **B. Analysis of OASIS to Settlements Discrepancies**

Where the market process is working properly, the CAISO will calculate the correct price and then both: (1) post that correct price to OASIS; and (2) use that correct price in the settlements system. Both the OASIS and the settlements system draw their data from a common source to facilitate this process and any discrepancy between the two systems for the same price record indicates some form of error in the CAISO process. With such a problem, the CAISO tariff requires the CAISO to settle on the price posted on OASIS.<sup>19</sup> As relevant to this filing, the primacy of OASIS prices can be problematic because there are cases where the CAISO knows that the price posted on OASIS is incorrect but it already has processed market settlements based on the correct prices.<sup>20</sup> Because of this circumstance, the waiver would maintain the status quo and would not create a market impact. Absent the waiver, however, the CAISO must resettle market participants based on the incorrect prices posted on OASIS.<sup>21</sup> The CAISO does not believe it would be an appropriate outcome for it to intentionally process recalculation settlement statements the CAISO and its market participants know involve substituting incorrect prices to take the place of correct prices.

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<sup>19</sup> CAISO tariff, section 35.3.2 (“in the event of a discrepancy between prices posted on the CAISO’s OASIS and prices provided to Scheduling Coordinators through other means, the CAISO will use the price posted on OASIS for Settlement purposes unless as” directed by the Commission”).

<sup>20</sup> The CAISO is also aware of instances where there is a discrepancy but the error is with the price used in the settlements system. Pursuant to authority in section 11.29.7 of the CAISO tariff, the CAISO may correct these through recalculation settlement statements and resolution of any such discrepancies is not the subject of this filing. The CAISO will communicate with market participants regarding any such settlements recalculations.

<sup>21</sup> If the CAISO did not conduct such a resettlement then it would face a tariff compliance concern for not having settled on the OASIS price, as called for under section 35.3.2 of the tariff.

The CAISO identified two categories of discrepancies between OASIS and the settlements system. The CAISO identified 192,295 PNode price records with a discrepancy between OASIS and settlement. Separately, the CAISO identified 193,690 SP/TIE price records with a discrepancy between OASIS and settlement.<sup>22</sup> The CAISO has posted detailed information about the price records for which there are discrepancies on its website.<sup>23</sup> The CAISO does not believe that *all* of these will require changes to the price posted on OASIS. Sometimes the discrepancy is caused by an error in the settlements system. For example, 153,337 of the 193,690 SP/TIE discrepancies involve cases where OASIS has a price posted but settlements contains a null value. These discrepancies will be addressed through the CAISO's settlements recalculation process by ensuring the settlements system reflects the value currently posted on OASIS. The CAISO, however, cannot determine conclusively at this time how many of the other discrepancies are due solely to an error in the settlements system. The CAISO accordingly requests that all 232,648 discrepancies that may result from an error in the OASIS price be considered within this waiver.<sup>24</sup> To the extent the CAISO can identify the correct price in time for the relevant eighteen-month recalculation settlement statement, the CAISO requests permission to make the correction to OASIS. If the CAISO cannot make a determination by that point, then, per

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<sup>22</sup> These cases are distinct from the instances where the CAISO completely miscalculated the SP/TIE price and both posted that incorrect price on OASIS and settled based on it.

<sup>23</sup> The information is available at: <http://www.aiso.com/Documents/PriceCorrectionFERCWaiverDataFiles.zip>. The underlying data was not amenable to creation of summary tables of the sort created for the SP/TIE errors and included as Attachment A.

<sup>24</sup> This value of 232,648 represents the 385,985 price records with discrepancies minus the 153,337 instances of SP/TIE discrepancies where the CAISO has no reason to believe that the discrepancy is the result of an error on OASIS.



its tariff, it would process the eighteen-month recalculation settlement statement to follow whatever price is posted on OASIS.

The CAISO determined with a reasonable degree of certainty that some of discrepancies were caused by errors on OASIS. Of the PNode-related OASIS errors, 115,549 price records (approximately 60%) involve cases where the price record in OASIS is null. The same is the case for 27,234 of the SP/TIE OASIS errors (approximately 14%). In these cases the CAISO system failed to transfer any price to OASIS and in nearly all of these cases, the CAISO is confident that the price in the settlements system is correct. Additionally, in some cases, for some undetermined reason the OASIS price for the GHG component of LMP was an arithmetic factor of the value represented in the settlements system, *e.g.*, the price in settlements would be \$X and the price on OASIS would be \$X/3. This accounted for 1,100 discrepancies, all of which were at PNodes. In these cases, the CAISO believes that the settlements price typically is correct and that the error is on OASIS.

This leaves 88,765 price records—75,646 PNode price records and 13,119 SP/TIE price records—for which there is a discrepancy between OASIS and the CAISO settlements system but the CAISO is unable, at this point, to determine the cause of the discrepancy and has no reasonable basis to determine whether the discrepancy is due to an error in the OASIS price, the settlements price, or both. The CAISO requests that these 88,765 uncategorized price records provisionally be considered within this waiver. If the Commission denies the CAISO's request to consider these records as provisionally within the waiver, then the CAISO does not intend to conduct any further analysis regarding these price records and will process recalculation settlement

statements based on whatever price is currently posted on OASIS for the relevant interval.

### III. Petition for Tariff Waiver

The Commission has granted requests for waiver of time limitations for price correction where: (1) the failure to discover the software defect during the period for time corrections was a good faith error, (2) the waiver is of limited scope, (3) a concrete problem needs to be remedied, and (4) granting the waiver will prevent harm to market participants.<sup>25</sup> This waiver request satisfies all four of these elements under Commission precedent for granting a tariff waiver and thus good cause exists to grant the requested relief.

First, the CAISO's errors were made in good faith. The interrelated system issues that created the pricing errors covered by this waiver request were not apparent from the EIM market simulation or other pre-production activities, nor were they of the sort that market simulation is designed to uncover. The CAISO did not reasonably foresee that the changes to underlying data structures and business processes associated with implementing EIM and the expanded FNM would create the price calculation errors the CAISO ultimately identified.

Second, the waiver is of limited scope. It applies during a defined period of time to the pricing records specified in Attachment A and further identified in datasets posted on the CAISO's website.<sup>26</sup> The CAISO's investigation has determined there were no

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<sup>25</sup> *Cal. Indep. Sys. Operator Corp.*, 147 FERC ¶ 61,111, P 14 (2014); *Southwest Power Pool, Inc.*, 138 FERC ¶ 61,200, P 5 (2012); *N.Y. Indep. Sys. Operator, Inc.*, 136 FERC ¶ 61,156, PP 5 & 7 (2011). *Southwest Power Pool, Inc.*, 135 FERC ¶ 61,032, P 12 (2011).

<sup>26</sup> The information is available at:  
<http://www.caiso.com/Documents/PriceCorrectionFERCWaiverDataFiles.zip>.

other affected transactions. The CAISO acknowledges this waiver covers over two million pricing records, which seems to belie this being a limited waiver. During the relevant period, however, the CAISO generated approximately 643 million pricing records. This waiver, while not trivial, still would cover less than a half of one percent of the pricing records generated during the relevant period. Finally, the CAISO has taken measures to improve its processes and procedures to ensure these types of issues are mitigated in the future.

Third, the requested waiver will remedy a concrete and clearly defined problem: the CAISO has posted and settled on prices it knows are erroneous. With the OASIS discrepancies, the waiver will allow the CAISO to maintain the status quo and allow it to avoid having to recalculate settlement statements to reflect prices it knows to be incorrect.

For the same reasons, the waiver meets the fourth criterion, the prevention of harm to market participants. In circumstances such as this, the Commission must balance the need for finality and the administrative burden (both to the utility and to its market participants) of resettlement, on the one hand, with the financial impact on market participants, on the other. The financial impact on participants militates in favor of the waiver. As reflected in confidential Attachment B, the vast majority of affected market participants will face relatively limited settlements recalculations if this waiver were granted. As reflected in Table 3 (and confidential Attachment B), a few market participants would see more significant financial consequences. In particular, the market participants identified in Table 3 as SC1 and SC2 were harmed disproportionately by the initial price calculation errors and would bear an outsized

share of the financial burden if the Commission denied this waiver request. At the same time, given the CAISO's revenue neutrality, these payments are partially facilitated by increased charges to other participants, most notably SC61 and SC62.

Moving forward with the price correction also will impose reasonably manageable administrative burdens. The CAISO has addressed the system issues that caused the pricing errors involved with this waiver filing and thus does not anticipate the need for similar waivers. In addition, these circumstances were anomalous, as they were tied to implementation of the EIM, in conjunction with the expanded FNM. The CAISO is unlikely to implement two changes of this magnitude on a near-simultaneous basis again. Finally, the CAISO has already conducted much of the difficult analytic and administrative work associated with the price correction process in the process of considering whether to pursue this waiver and ultimately supporting this filing. The marginal effort for the CAISO to proceed with the price corrections and settlements recalculations is relatively limited.

#### **IV. Service**

The ISO has served copies of this filing upon the California Public Utilities Commission and all parties with effective scheduling coordinator service agreements under the ISO tariff. In addition, the ISO has posted this filing on its website.

**V. Correspondence**

The ISO requests that all correspondence, pleadings and other communications concerning this filing be served upon:

Anna A. McKenna  
Assistant General Counsel  
David S. Zlotlow  
Senior Counsel  
California Independent System  
Operator Corporation  
250 Outcropping Way  
Folsom, CA 95630  
Tel: (916) 351-4400  
Fax: (916) 608-7222  
[dzlotlow@caiso.com](mailto:dzlotlow@caiso.com)

**VI. Conclusion**

The Commission should find that good cause exists to grant a one-time waiver of certain requirements in section 35.2 of the CAISO tariff to permit the CAISO to correct

erroneous prices for certain market intervals at certain pricing locations between October 15, 2014, and April 30, 2015, as identified in Attachments A and B.

Respectfully submitted,

**By: /s/ David S. Zlotlow**

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Counsel for the California Independent  
System Operator Corporation

Date: February 26, 2016

## 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 26<sup>th</sup> day of February, 2016.

/s/ Martha Sedgley  
Martha Sedgley

**Attachment A – Tables 1A-7A**

**EIM-FNM Price Waiver**

**California Independent System Operator Corporation**







DGAP_BPAT-APND/RESTON230	Y	Y				Y	Y			Y	Y			Y					Y		Y	Y			Y	Y	Y	Y	Y	Y
DGAP_BPAT-APND/SALEMPAC	Y	Y	Y			Y	Y			Y	Y			Y					Y		Y	Y			Y	Y	Y	Y	Y	Y
DGAP_BPAT-APND/SANTIAMP			Y																											
DGAP_BPAT-APND/SANTIAMPAC	Y	Y				Y	Y			Y	Y			Y					Y		Y	Y			Y	Y	Y	Y	Y	Y
DGAP_BPAT-APND/SUMMERLA			Y																											
DGAP_BPAT-APND/SUMMERLAKENT	Y	Y				Y	Y			Y	Y			Y					Y		Y	Y			Y	Y	Y	Y	Y	Y
DGAP_GCPD-APND/MIDC	Y	Y	Y			Y	Y			Y	Y			Y					Y		Y	Y			Y	Y	Y	Y	Y	Y
DGAP_IPCO-APND/BORA	Y	Y	Y			Y	Y		Y	Y	Y	Y	Y	Y					Y		Y	Y			Y	Y	Y	Y	Y	Y
DGAP_IPCO-APND/BRDY	Y	Y	Y			Y	Y		Y	Y	Y	Y	Y	Y					Y		Y	Y			Y	Y	Y	Y	Y	Y
DGAP_IPCO-APND/ENPR	Y	Y	Y			Y	Y		Y	Y	Y	Y	Y	Y					Y		Y	Y			Y	Y	Y	Y	Y	Y
DGAP_IPCO-APND/GSHN	Y	Y	Y			Y	Y		Y	Y	Y	Y	Y	Y					Y		Y	Y			Y	Y	Y	Y	Y	Y
DGAP_IPCO-APND/HMWWY	Y	Y	Y			Y	Y		Y	Y	Y	Y	Y	Y					Y		Y	Y			Y	Y	Y	Y	Y	Y
DGAP_IPCO-APND/KPRT	Y	Y	Y			Y	Y		Y	Y	Y	Y	Y	Y					Y		Y	Y			Y	Y	Y	Y	Y	Y
DGAP_IPCO-APND/KPRTW	Y	Y	Y			Y	Y		Y	Y	Y	Y	Y	Y					Y		Y	Y			Y	Y	Y	Y	Y	Y
DGAP_IPCO-APND/POPBORAH	Y	Y	Y			Y	Y		Y	Y	Y	Y	Y	Y					Y		Y	Y			Y	Y	Y	Y	Y	Y
DGAP_LDWP-APND/MPAC	Y	Y	Y			Y	Y	Y	Y	Y	Y	Y	Y	Y	Y				Y	Y	Y	Y			Y	Y	Y	Y	Y	Y
DGAP_NEVP-APND/GON.PAV	Y	Y	Y			Y	Y	Y	Y	Y	Y	Y	Y	Y	Y				Y	Y	Y	Y			Y	Y	Y	Y	Y	Y
DGAP_NEVP-APND/REDB	Y	Y	Y			Y	Y	Y	Y	Y	Y	Y	Y	Y	Y				Y	Y	Y	Y			Y	Y	Y	Y	Y	Y
DGAP_NWMT-APND/GSHNM	Y	Y	Y			Y	Y	Y	Y	Y	Y	Y	Y	Y					Y	Y	Y	Y			Y	Y	Y	Y	Y	Y
DGAP_NWMT-APND/MLCK	Y	Y	Y			Y	Y	Y	Y	Y	Y	Y	Y	Y					Y	Y	Y	Y			Y	Y	Y	Y	Y	Y
DGAP_NWMT-APND/YTP	Y	Y	Y			Y	Y	Y	Y	Y	Y	Y	Y	Y					Y	Y	Y	Y			Y	Y	Y	Y	Y	Y
DGAP_PGE-APND/BETHEL	Y	Y	Y			Y	Y		Y			Y	Y	Y					Y		Y	Y			Y	Y	Y	Y	Y	Y
DGAP_PGE-APND/GRESHAM	Y	Y	Y			Y	Y		Y			Y	Y	Y					Y		Y	Y			Y	Y	Y	Y	Y	Y
DGAP_PGE-APND/PACW.PGE	Y	Y	Y			Y	Y		Y			Y	Y	Y					Y		Y	Y			Y	Y	Y	Y	Y	Y
DGAP_PGE-APND/ROUNDBUT			Y																											
DGAP_PGE-APND/ROUNDBUTTE	Y	Y				Y	Y		Y			Y	Y	Y					Y		Y	Y			Y	Y	Y	Y	Y	Y
DGAP_WACM-APND/BOZ	Y	Y	Y			Y	Y	Y	Y	Y	Y	Y	Y	Y	Y				Y	Y	Y	Y			Y	Y	Y	Y	Y	Y
DGAP_WACM-APND/DJ	Y	Y	Y			Y	Y	Y	Y	Y	Y	Y	Y	Y	Y				Y	Y	Y	Y			Y	Y	Y	Y	Y	Y
DGAP_WACM-APND/FGE	Y	Y	Y			Y	Y	Y	Y	Y	Y	Y	Y	Y	Y				Y	Y	Y	Y			Y	Y	Y	Y	Y	Y
DGAP_WACM-APND/SWR	Y	Y	Y			Y	Y	Y	Y	Y	Y	Y	Y	Y	Y				Y	Y	Y	Y			Y	Y	Y	Y	Y	Y

DGAP_WACM-APND/VNL	Y	Y	Y			Y	Y	Y	Y	Y	Y	Y	Y	Y	Y					Y	Y	Y	Y		Y	Y	Y	Y	Y	Y
DGAP_WACM-APND/WYOCENTR			Y																											
DGAP_WACM-APND/WYOCENTRAL	Y	Y				Y	Y	Y	Y	Y	Y	Y	Y	Y	Y					Y	Y	Y	Y		Y	Y	Y	Y	Y	Y
DGAP_WACM-APND/WYODAK	Y	Y	Y			Y	Y	Y	Y	Y	Y	Y	Y	Y	Y					Y	Y	Y	Y		Y	Y	Y	Y	Y	Y
DGAP_WACM-APND/WYOEAST	Y	Y	Y			Y	Y	Y	Y	Y	Y	Y	Y	Y	Y					Y	Y	Y	Y		Y	Y	Y	Y	Y	Y
DGAP_WACM-APND/YTPW	Y	Y	Y			Y	Y	Y	Y	Y	Y	Y	Y	Y	Y					Y	Y	Y	Y		Y	Y	Y	Y	Y	Y
DGAP_WALC-APND/GLENCANY			Y																											
DGAP_WALC-APND/GLENCANYON2	Y	Y				Y	Y	Y	Y			Y	Y	Y	Y					Y	Y	Y	Y		Y	Y	Y	Y	Y	Y
MALIN_5_N101/MALIN500	Y		Y	Y		Y																				Y		Y		
MONA_3_N501/MDWP	Y		Y			Y	Y	Y	Y	Y		Y	Y	Y										Y		Y	Y	Y	Y	Y















**TABLE 6A**

March-2015

SP_TIE	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	19	20	21	22	23	24	25	26	27	28	29	30	31	
CGAP_CHPD_MIDC-APND/MIDC	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y	Y		Y	Y	Y	Y	
CGAP_DOPD_MIDC-APND/MIDC	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y	Y		Y	Y	Y	Y
CGAP_GCPD_MIDC-APND/MIDC	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y	Y		Y	Y	Y	Y
CRAGVIEW_1_GN001/CRAG	Y	Y							Y		Y	Y	Y						Y				Y	Y		Y					Y
DGAP_ARIZ-APND/CHOLLA500	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y	Y
DGAP_ARIZ-APND/PINT	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y	Y
DGAP_AVA-APND/DRYCREEK	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y		Y	Y	Y	Y
DGAP_BPAT-APND/BPAT.PACW	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y	Y		Y	Y	Y	Y
DGAP_BPAT-APND/CHEHALISPW	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y	Y		Y	Y	Y	Y
DGAP_BPAT-APND/DALREED	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y	Y		Y	Y	Y	Y
DGAP_BPAT-APND/GOODNOEHILL1	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y	Y		Y	Y	Y	Y
DGAP_BPAT-APND/MALIN	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y	Y		Y	Y	Y	Y
DGAP_BPAT-APND/MALIN230	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y	Y		Y	Y	Y	Y
DGAP_BPAT-APND/MCNARY	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y	Y		Y	Y	Y	Y
DGAP_BPAT-APND/MIDCREMOTE	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y	Y		Y	Y	Y	Y
DGAP_BPAT-APND/MIDWAY230	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y	Y		Y	Y	Y	Y
DGAP_BPAT-APND/RESTON230	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y	Y		Y	Y	Y	Y
DGAP_BPAT-APND/SALEMPAC	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y	Y		Y	Y	Y	Y
DGAP_BPAT-APND/SANTIAMPAC	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y	Y		Y	Y	Y	Y
DGAP_BPAT-APND/SUMMERLAKENT	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y	Y		Y	Y	Y	Y
DGAP_GCPD-APND/MIDC	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y	Y		Y	Y	Y	Y
DGAP_IPCO-APND/BORA	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y	Y		Y	Y	Y	Y
DGAP_IPCO-APND/BRDY	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y	Y		Y	Y	Y	Y
DGAP_IPCO-APND/ENPR	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y	Y		Y	Y	Y	Y
DGAP_IPCO-APND/GSHN	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y			Y	Y	Y	Y	Y	Y		Y	Y	Y	Y



**TABLE 7A**

April-2015

SP_TIE	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	23	24	25	26	27	28	29	30
CGAP_CHPD_MIDC-APND/MIDC	Y	Y		Y	Y	Y	Y	Y			Y		Y	Y	Y	Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
CGAP_DOPD_MIDC-APND/MIDC	Y	Y		Y	Y	Y	Y	Y			Y		Y	Y	Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y	Y		Y
CGAP_GCPD_MIDC-APND/MIDC	Y			Y	Y	Y	Y	Y			Y		Y	Y		Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
CRAVIEW_1_GN001/CRAG					Y	Y							Y		Y				Y	Y	Y	Y		Y			Y		
DGAP_ARIZ-APND/CHOLLA500		Y	Y	Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y	Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_ARIZ-APND/PINT		Y	Y	Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y	Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_AVA-APND/DRYCREEK				Y	Y	Y	Y	Y			Y		Y	Y		Y	Y	Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_BPAT-APND/BPAT.PACW	Y			Y	Y	Y	Y	Y			Y		Y	Y	Y	Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_BPAT-APND/CHEHALISPPWR	Y			Y	Y	Y	Y	Y			Y		Y	Y	Y	Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_BPAT-APND/DALREED	Y			Y	Y	Y	Y	Y			Y		Y	Y	Y	Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_BPAT-APND/GOODNOEHILL1	Y			Y	Y	Y	Y	Y			Y		Y	Y	Y	Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_BPAT-APND/MALIN	Y			Y	Y	Y	Y	Y			Y		Y	Y	Y	Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_BPAT-APND/MALIN230	Y			Y	Y	Y	Y	Y			Y		Y	Y	Y	Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_BPAT-APND/MCNARY	Y			Y	Y	Y	Y	Y			Y		Y	Y	Y	Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_BPAT-APND/MIDCREMOTE	Y			Y	Y	Y	Y	Y			Y		Y	Y	Y	Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_BPAT-APND/MIDWAY230	Y			Y	Y	Y	Y	Y			Y		Y	Y	Y	Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_BPAT-APND/RESTON230	Y			Y	Y	Y	Y	Y			Y		Y	Y	Y	Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_BPAT-APND/SALEMPAC	Y			Y	Y	Y	Y	Y			Y		Y	Y	Y	Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_BPAT-APND/SANTIAMPAC	Y			Y	Y	Y	Y	Y			Y		Y	Y	Y	Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_BPAT-APND/SUMMERLAKENT	Y			Y	Y	Y	Y	Y			Y		Y	Y	Y	Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_GCPD-APND/MIDC	Y	Y		Y	Y	Y	Y	Y			Y		Y	Y	Y	Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_IPCO-APND/BORA			Y	Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y			Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_IPCO-APND/BRDY			Y	Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y			Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_IPCO-APND/ENPR			Y		Y	Y	Y	Y			Y		Y		Y			Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_IPCO-APND/GSHN			Y	Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y			Y	Y	Y	Y	Y		Y		Y	Y		Y

DGAP_IPCO-APND/HMWY			Y		Y	Y	Y	Y			Y			Y		Y	Y	Y	Y	Y		Y		Y	Y		Y	
DGAP_IPCO-APND/KPRT			Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y			Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_IPCO-APND/KPRTW			Y		Y	Y	Y	Y			Y			Y		Y	Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_IPCO-APND/POPBORAH			Y		Y	Y	Y	Y			Y			Y		Y	Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_LDWP-APND/MPAC			Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_NEVP-APND/GON.PAV	Y	Y	Y		Y	Y	Y	Y	Y	Y		Y	Y	Y			Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_NEVP-APND/REDB	Y	Y	Y		Y	Y	Y	Y	Y	Y		Y	Y	Y			Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_NWMT-APND/GSHNM			Y		Y	Y	Y	Y	Y	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y	Y		Y
DGAP_NWMT-APND/MLCK			Y		Y	Y	Y	Y	Y	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y	Y		Y
DGAP_NWMT-APND/YTP			Y		Y	Y	Y	Y	Y	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y	Y		Y	Y	Y	Y		Y
DGAP_PGE-APND/BETHEL	Y				Y	Y	Y	Y	Y				Y	Y	Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_PGE-APND/GRESHAM	Y				Y	Y	Y	Y	Y				Y	Y	Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_PGE-APND/PACW.PGE	Y				Y	Y	Y	Y	Y				Y	Y	Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_PGE-APND/ROUNDBUTTE	Y				Y	Y	Y	Y	Y				Y	Y	Y		Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_WACM-APND/BOZ			Y	Y		Y	Y	Y	Y	Y		Y	Y	Y			Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_WACM-APND/DJ			Y	Y		Y	Y	Y	Y	Y		Y	Y	Y			Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_WACM-APND/FGE			Y	Y		Y	Y	Y	Y	Y		Y	Y	Y			Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_WACM-APND/SWR			Y	Y		Y	Y	Y	Y	Y		Y	Y	Y			Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_WACM-APND/VNL			Y	Y		Y	Y	Y	Y	Y		Y	Y	Y			Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_WACM-APND/WYOCENTRAL			Y	Y		Y	Y	Y	Y	Y		Y	Y	Y			Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_WACM-APND/WYODAK			Y	Y		Y	Y	Y	Y	Y		Y	Y	Y			Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_WACM-APND/WYOEAST			Y	Y		Y	Y	Y	Y	Y		Y	Y	Y			Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_WACM-APND/YTPW			Y	Y		Y	Y	Y	Y	Y		Y	Y	Y			Y	Y	Y	Y	Y		Y		Y	Y		Y
DGAP_WALC-APND/GLENCANYON2			Y		Y	Y	Y	Y	Y	Y		Y	Y	Y	Y		Y	Y	Y	Y	Y		Y	Y	Y	Y		Y
MALIN_5_N101/MALIN500	Y					Y	Y					Y			Y		Y	Y		Y								
MONA_3_N501/MDWP			Y			Y				Y			Y		Y		Y	Y	Y	Y			Y			Y		Y

**Attachment B – PUBLIC**  
**EIM-FNM Price Correction Waiver**  
**California Independent System Operator Corporation**

Market Participant	CRR	SP-TIE DAM	SP-TIE EIM	SP-TIE RTM	Grand Total
SC1	\$332,700	\$67,906	\$49,423	(\$5,229)	\$444,800
SC2	\$137,063	\$54,727	\$10,463	\$10,075	\$212,327
SC3	\$66,354	\$6,497	\$2,065	(\$3,401)	\$71,514
SC4	\$14,248	\$19,408	\$13,795	\$15,794	\$63,244
SC5	\$48,858	\$0	\$0	\$0	\$48,858
SC6	\$0	\$36,861	\$0	(\$431)	\$36,430
SC7	\$26,604	\$8,332	\$0	\$978	\$35,915
SC8	\$29,718	\$4,161	\$0	(\$1,250)	\$32,629
SC9	\$11,667	\$6,191	\$0	\$2,988	\$20,846
SC10	\$0	\$9,122	\$9,980	\$189	\$19,292
SC11	\$16,634	\$0	\$0	\$0	\$16,634
SC12	\$13,540	(\$0)	\$0	\$0	\$13,540
SC13	\$10,966	\$0	\$0	\$0	\$10,966
SC14	\$0	\$0	\$4,848	\$5,427	\$10,275
SC15	\$4,160	\$10,724	(\$2,227)	(\$3,116)	\$9,542
SC16	\$6,958	\$0	\$0	\$0	\$6,958
SC17	\$0	\$6,787	\$0	(\$71)	\$6,716
SC18	\$1,521	(\$0)	\$606	\$4,318	\$6,444
SC19	\$6,168	\$0	\$0	\$0	\$6,168
SC20	\$0	\$5,294	\$672	\$63	\$6,028
SC21	\$0	\$5,912	\$0	(\$119)	\$5,793
SC22	\$5,288	\$0	\$0	\$0	\$5,288
SC23	(\$1,817)	\$7,500	\$0	(\$632)	\$5,052
SC24	\$0	\$5,006	\$0	\$0	\$5,006
SC25	\$4,953	\$0	\$0	\$0	\$4,953
SC26	\$3,288	\$0	\$0	\$0	\$3,288
SC27	\$3,116	(\$0)	\$0	\$0	\$3,116
SC28	\$0	\$0	\$1,172	\$0	\$1,172
SC29	\$0	(\$0)	\$876	\$0	\$876
SC30	\$402	\$0	\$0	\$0	\$402
SC31	\$383	\$0	\$0	\$0	\$383
SC32	\$0	\$0	\$376	\$0	\$376
SC33	\$302	\$0	\$0	\$0	\$302



Market Participant	CRR	SP-TIE DAM	SP-TIE EIM	SP-TIE RTM	Grand Total
SC34	\$33	\$0	\$0	\$0	\$33
SC35	\$12	\$0	\$0	\$0	\$12
SC36	\$0	\$0	\$0	\$0	\$0
SC37	\$0	\$0	\$0	\$0	\$0
SC38	\$0	(\$0)	\$0	\$0	(\$0)
SC39	(\$1)	\$0	\$0	\$0	(\$1)
SC40	(\$1)	\$0	\$0	\$0	(\$1)
SC41	\$0	\$117	(\$159)	\$0	(\$43)
SC42	(\$632)	\$0	\$533	\$0	(\$100)
SC43	(\$205)	\$0	\$0	\$0	(\$205)
SC44	(\$430)	\$0	\$0	\$0	(\$430)
SC45	(\$716)	\$0	\$0	\$0	(\$716)
SC46	(\$1,377)	\$0	\$0	\$0	(\$1,377)
SC47	(\$4,609)	\$0	\$0	\$0	(\$4,609)
SC48	(\$4,691)	\$0	\$0	\$0	(\$4,691)
SC49	(\$4,696)	\$0	\$0	\$0	(\$4,696)
SC50	(\$5,238)	\$0	\$0	\$0	(\$5,238)
SC51	(\$5,773)	\$322	\$0	\$0	(\$5,451)
SC52	(\$9,089)	\$0	\$0	\$0	(\$9,089)
SC53	\$0	\$0	(\$12,843)	\$0	(\$12,843)
SC54	(\$13,670)	\$1,529	\$0	(\$3,120)	(\$15,261)
SC55	\$0	\$0	(\$15,515)	(\$2,934)	(\$18,449)
SC56	\$0	\$8,501	(\$27,859)	(\$151)	(\$19,508)
SC57	\$0	\$1,041	(\$23,071)	(\$53)	(\$22,083)
SC58	(\$26,551)	\$0	\$0	\$0	(\$26,551)
SC59	(\$32,646)	\$0	\$0	\$0	(\$32,646)
SC60	(\$51,522)	\$0	\$0	\$0	(\$51,522)
SC61	(\$103,390)	\$2,973	\$0	\$0	(\$100,416)
SC62	\$0	\$0	(\$110,245)	(\$1,717)	(\$111,963)
<b>Grand Total</b>	<b>\$477,880</b>	<b>\$268,912</b>	<b>(\$97,112)</b>	<b>\$17,608</b>	<b>\$667,288</b>

FERC rendition of the electronically filed tariff records in Docket No. ER16-01019-000

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488-28da88c3-a651-4e37-9d1a-3fbe66688589.PDF.....39-41

FERC GENERATED TARIFF FILING.RTF.....42-42