

February 12, 2008

VIA OVERNIGHT DELIVERY

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

**Re: California Independent System Operator Corporation
Tariff Amendment to Address Division of Responsibility Between
Control Centers
Docket No. ER09-____-000**

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act,¹ and Section 35.13 of the Commission's regulations,² the California Independent System Operator Corporation ("CAISO") respectfully submits for filing an original and five copies of an amendment to the Market Redesign and Technology Upgrade ("MRTU") tariff.³ The CAISO requests that the changes to the MRTU tariff be made effective as of April 15, 2009, 61 days from the date of this filing . The purpose of these tariff modifications is to accomplish the following:

- Provide that the primary CAISO control center located in Folsom, California have primary operational control; and
- Provide that the CAISO management may delegate responsibilities to the back-up control center located in Alhambra, California, from time to time, in which case the primary CAISO control center would serve as back-up facility for those responsibilities.

Two additional copies of this filing are enclosed to be date-stamped and returned to our office via the self-addressed, postage prepaid envelope contained herein.

¹ 16 U.S.C. § 824d.

² 18 C.F.R. § 35.13.

³ Capitalized terms not otherwise defined herein have the meanings set forth in the Master Definitions Supplement, Appendix A to the MRTU Tariff.

I. Background and Summary

The CAISO tariff provides for a primary control center in Folsom, California and a back-up control center in Alhambra, California to exercise operational control over transmission facilities that are part of the CAISO grid. The tariff currently requires that the primary control center maintain operational control of all transmission lines over 230 kV. The tariff also requires that the back-up control center maintain operational control over transmission lines up to and including 230kV that are part of the CAISO grid in the service territories of Southern California Edison Company (SCE) and San Diego Gas & Electric Company (SDG&E). After MRTU is implemented the CAISO desires, in general, to have the ability to delegate responsibilities between control centers and specifically intends to delegate operational control responsibilities for transmission lines over 230kV in the service territories of SCE and SDG&E to the Alhambra control center.

II. Proposed Changes to the MRTU Tariff

In this proposed tariff amendment, the CAISO proposes that the CAISO's primary control center located in Folsom, California retain operational control over all transmission lines subject to the CAISO's discretion to delegate responsibilities to its back-up control center located in Alhambra, California.⁴ Under the proposed tariff amendments, whenever a responsibility is delegated to the back-up control center, the primary control center would then serve as the back-up facility for those responsibilities.⁵ The proposed amendments do not modify the tariff description of authorities undertaken by the CAISO's control centers but instead provide the CAISO with the operational flexibility to delegate responsibilities between control centers without requiring additional tariff amendments. The CAISO intends to provide written notice to participating transmission owners and market participants when it delegates responsibilities to the back-up control center.

III. Stakeholder Process

On December 31, 2008, the CAISO posted on its website proposed tariff changes related to the division of operational responsibility between the Folsom and Alhambra Control Centers. No written comments were submitted to the CAISO in response to the proposed tariff changes. The CAISO held a conference call on January 7, 2009 to discuss the proposed tariff changes. After considering stakeholder input on this conference call, the CAISO revised the

⁴ See, Attachment B hereto Proposed MRTU Tariff Sections 7.1.1 and 7.1.3.

⁵ Id. at Proposed Section 7.1.2

proposed tariff modifications and posted them on its website. During the stakeholder process, no party opposed the CAISO's proposed tariff amendments. On February 10, 2009, the CAISO Governing Board approved the submission of this amendment.

IV. Effective Date

The CAISO requests that the Commission approve the proposed tariff changes to be effective as of April 15, 2009, 61 days from the date of this filing.

V. Communications

Communications regarding this filing should be addressed to the following individuals, whose names should be placed on the official service list established by the Secretary with respect to this submittal:

Sidney M. Davies*, Assistant General Counsel California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630 Phone: (916) 608-7144 Fax: (916) 608-7296 sdavies@CAISO.com	Andrew Ulmer*, Senior Counsel California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630 Phone: (916) 608-7209 Fax: (916) 608-7222 aulmer@CAISO.com
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* Individuals designated for service pursuant to Rule 203(b)(3),
18 C.F.R. § 385.203(b)(3).

VI. Service

The CAISO has served copies of this transmittal letter, and all attachments, on the California Public Utilities Commission, the California Energy Commission and all parties with effective Scheduling Coordinator Service Agreements under the currently effective CAISO Tariff and the MRTU Tariff. In addition, the CAISO is posting this transmittal letter and all attachments on the CAISO Website.

VII. Attachments

The following documents, in addition to this transmittal letter, support this filing:

Attachment A	Clean sheets under the MRTU Tariff showing the revisions described in this Amendment
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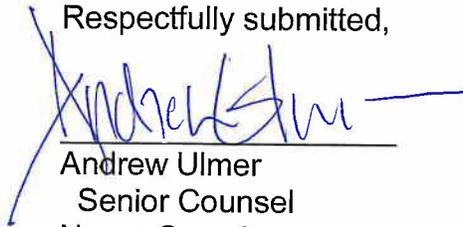
Attachment B Sheets showing, in black-line format, the Tariff changes described in Attachment A hereto

VIII. Conclusion

For the foregoing reasons, the CAISO respectfully requests that the Commission approve this tariff amendment as filed. Please do not hesitate to contact the undersigned if you have any questions.

February 12, 2009

Respectfully submitted,



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Attachment A – Clean Sheets
4th Replacement CAISO Tariff (MRTU)
500kV Operational Control (Folsom-Alhambra)
February 13, 2009

7 SYSTEM OPERATIONS UNDER NORMAL AND EMERGENCY OPERATING CONDITIONS.

7.1 CAISO Control Center Operations.

7.1.1 Maintain CAISO Control Center.

The CAISO shall maintain a WECC approved Balancing Authority Area and Primary CAISO Control Center to direct the operation of all facilities forming part of the CAISO Controlled Grid, including Reliability Must-Run Units, System Resources, and Generating Units providing Ancillary Services.

7.1.2 Maintain Back-up Control Facility.

The CAISO shall maintain back-up control facilities remote from the Primary CAISO Control Center sufficient to enable the CAISO to continue to direct the operation of the CAISO Controlled Grid, Reliability Must-Run Units, System Resources and Generating Units providing Ancillary Services in the event of the Primary CAISO Control Center becoming inoperable. The CAISO may delegate responsibilities to the Backup Control Center in which case the Primary CAISO Control Center shall serve as the back-up control facility for those responsibilities.

7.1.3 CAISO Control Center Authorities.

The CAISO shall have full authority, subject to this CAISO Tariff, to direct the operation of the facilities referred to in Section 7.1.1 and 7.1.2 including (without limitation), to:

- (a) direct the physical operation by the Participating TOs of transmission facilities under the Operational Control of the CAISO, including (without limitation) circuit breakers, switches, voltage control equipment, protective relays, metering, and Load Shedding equipment;
- (b) commit and dispatch Reliability Must-Run Units, except that the CAISO shall only commit Reliability Must-Run Generation for Ancillary Services capacity according to Section 41;
- (c) order a change in operating status of auxiliary equipment required to control voltage or frequency;
- (d) take any action it considers to be necessary consistent with Good Utility Practice to protect against uncontrolled losses of Load or Generation and/or equipment damage resulting from unforeseen occurrences;
- (e) control the output of Generating Units, Interconnection schedules, and System Resources that are selected to provide Ancillary Services or Energy;
- (f) Dispatch Curtailable Demand which has been scheduled to provide Non-Spinning Reserve;
- (g) procure Energy for a threatened or imminent System Emergency;
- (h) require the operation of resources which are at the CAISO's disposal in a System Emergency, as described in Section 7.7;

- (i) exercise Operational Control of all transmission lines greater than 230kV and associated equipment on the CAISO Controlled Grid;
- (j) exercise Operation Control of all Interconnections; and
- (k) exercise Operational Control of all 230kV and lower voltage transmission lines and associated station equipment identified in the CAISO Register as that portion of the CAISO Controlled Grid.

The CAISO will exercise its authority under this Section 7.1.3 by issuing Dispatch Instructions to the relevant Market Participants using the relevant communications method described in this CAISO Tariff.

Attachment B – Blacklines
4th Replacement CAISO Tariff (MRTU)
500kV Operational Control (Folsom-Alhambra)
February 13, 2009

* * *

7.1.1 Maintain CAISO Control Center.

The CAISO shall maintain a WECC approved Balancing Authority Area and Primary CAISO eControl eCenter to direct the operation of all facilities forming part of the CAISO Controlled Grid, including Reliability Must-Run Units, System Resources, and Generating Units providing Ancillary Services. ~~The Primary CAISO Control Center shall have Operational Control over:~~

- ~~(a) — all transmission lines greater than 230 kV and associated station equipment on the CAISO Controlled Grid;~~
- ~~(b) — all Interconnections; and~~
- ~~(c) — all 230 kV and lower voltage transmission lines and associated station equipment identified in the CAISO Register as that portion of the CAISO Controlled Grid located in the Pacific Gas and Electric Company PTO Service Territory.~~

7.1.2 Maintain Back-up Control Facility.

The CAISO shall maintain back-up control facilities remote from the Primary CAISO Control Center sufficient to enable the CAISO to continue to direct the operation of the CAISO Controlled Grid, Reliability Must-Run Units, System Resources and Generating Units providing Ancillary Services in the event of the Primary CAISO Control Center becoming inoperable. The CAISO may delegate responsibilities to the Backup Control Center in which case the Primary CAISO Control Center shall serve as the back-up control facility for those responsibilities.

~~The Backup CAISO Control Center shall have Operational Control over all 230 kV and lower voltage transmission lines and associated station equipment identified in the CAISO Register as that portion of the CAISO Controlled Grid located in the Southern California Edison Company and San Diego Gas & Electric Company PTO Service Territories.~~

7.1.3 CAISO Control Center Authorities.

The CAISO shall have full authority, subject to this CAISO Tariff, to direct the operation of the facilities referred to in Section 7.1.1 and 7.1.2 including (without limitation), to:

- (a) direct the physical operation by the Participating TOs of transmission facilities under the Operational Control of the CAISO, including (without limitation) circuit breakers, switches, voltage control equipment, protective relays, metering, and Load Shedding equipment;
- (b) commit and dispatch Reliability Must-Run Units, except that the CAISO shall only commit Reliability Must-Run Generation for Ancillary Services capacity according to Section 41;
- (c) order a change in operating status of auxiliary equipment required to control voltage or frequency;
- (d) take any action it considers to be necessary consistent with Good Utility Practice to protect against uncontrolled losses of Load or Generation and/or equipment damage resulting from unforeseen occurrences;
- (e) control the output of Generating Units, Interconnection schedules, and System Resources that are selected to provide Ancillary Services or Energy;
- (f) Dispatch Curtailable Demand which has been scheduled to provide Non-Spinning Reserve;
- (g) procure Energy for a threatened or imminent System Emergency; ~~and~~
- (h) require the operation of resources which are at the CAISO's disposal in a System Emergency, as described in Section 7.7.1;
- (i) exercise Operational Control of all transmission lines greater than 230kV and associated equipment on the CAISO Controlled Grid;
- (j) exercise Operation Control of all Interconnections; and
- (k) exercise Operational Control of all 230kV and lower voltage transmission lines and associated station equipment identified in the CAISO Register as that portion of the CAISO Controlled Grid.

The CAISO will exercise its authority under this Section 7.1.3 by issuing Dispatch Instructions to the relevant Market Participants using the relevant communications method described in this CAISO Tariff.

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