



January 10, 2023

The Honorable Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

**Re: California Independent System Operator Corporation  
Amendment to August 15, 2022 Compliance Filing  
Docket No. ER21-2455-\_\_\_**

Dear Secretary Bose:

The California Independent System Operator Corporation (“CAISO”) submits this amendment to its August 15, 2022 filing to comply with the Commission order issued in this proceeding on June 17, 2022 (“Compliance Order”),<sup>1</sup> in response to the CAISO’s initial filing to comply with Order No. 2222 on distributed energy resource (“DER”) aggregations (“DERAs”).<sup>2</sup> The instant amendment makes several minor amendments at the recommendation of Commission staff.

## **I. Amended Tariff Revisions**

The CAISO proposes the following amendments to the tariff revisions submitted in its August 15, 2022 filing:

1. Substitute “in” for “of” in Section 4.1.4 of the Distributed Energy Resource Provider Agreement. This amendment will better conform with the Compliance Order.<sup>3</sup>

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<sup>1</sup> *California Independent System Operator Corp.*, 179 FERC ¶ 61,197 (2022) (“Compliance Order”). Capitalized terms not otherwise defined herein have the meanings set forth in the CAISO tariff, and references to specific sections, articles, and appendices are references to sections, articles, and appendices in the current CAISO tariff as revised or proposed in this filing, unless otherwise indicated.

<sup>2</sup> *Participation of Distributed Energy Res. Aggregations in Mkts. Operated by Reg’l Transmission Orgs. & Indep. Sys. Operators*, Order No. 2222, 172 FERC ¶ 61,247 (2020), *order on reh’g*, Order No. 2222-A, 174 FERC ¶ 61,197, *order on reh’g*, Order No. 2222-B, 175 FERC ¶ 61,227 (2021).

<sup>3</sup> Compliance Order at P 26.

2. Include a blank Schedule 4 to the Distributed Energy Resource Provider Agreement.
3. Change “Section13 [sic]” in Section 4.17.4 to “under Section 13” for better clarity.
4. Change “these concerns” in Section 4.17.4 to “any issues related to the distribution utility review process.” This change will clarify that parties can raise any issue through the CAISO’s dispute resolution processes.
5. Strike unnecessarily retained language in Section 4.17.4. The CAISO inadvertently retained “regarding information provided about Distributed Energy Resources comprising a Distributed Energy Resource Aggregation(s)” at the end of the sentence.<sup>4</sup>
6. Add “and any other information regarding the Distributed Energy Resources provided by the Utility Distribution Company or Metered Subsystem to CAISO” after “written comments” to Section 4.17.4. This addition will clarify the CAISO does not intend to limit to the universe of shared information in this provision.<sup>5</sup>

The Commission should approve these revisions as just and reasonable. They conform with the Compliance Order and express written recommendations from Commission Staff.

## **II. Effective Date**

The tariff revisions in the instant filing all pertain to provisions accepted by the Commission in its initial order, effective June 16, 2022, subject to a further compliance filing.<sup>6</sup>

## **III. Contents of Filing**

Besides this transmittal letter, this compliance filing includes these attachments:

- |              |   |
|--------------|---|
| Attachment A | Clean CAISO tariff sheets incorporating this compliance filing; and |
| Attachment B | Red-lined document showing the revisions in this compliance filing. |

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<sup>4</sup> Compliance Order at P 210.

<sup>5</sup> Compliance Order at P 209.

<sup>6</sup> Compliance Order at P 240.

**IV. Conclusion**

For the reasons set forth above, the CAISO respectfully requests that the Commission find that the CAISO complies with Order No. 2222 and the Compliance Order.

Respectfully submitted,

/s/ William H. Weaver

Roger E. Collanton  
General Counsel  
William H. Weaver  
Assistant General Counsel

Counsel for the California Independent  
System Operator Corporation

## 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 10th day of January, 2023.

/s/ Jacqueline Meredith

Jacqueline Meredith  
An employee of the California ISO

**Attachment A – Clean Tariff**

**Amendment to August 15, 2022 Compliance Filing**

**California Independent System Operator Corporation**

**January 10, 2023**

## **Section 4**

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### **4.17.4 Identification of Distributed Energy Resources**

Each Distributed Energy Resource Provider will provide information, as described in the Business Practice Manual, identifying each of its Distributed Energy Resource Aggregations and such information regarding the location, capacity, operating characteristics and applicable Generation Distribution Factors of its Distributed Energy Resource Aggregation(s) as may be reasonably requested from time to time by the CAISO, and when the information changes due to the removal, addition, or modification of a Distributed Energy Resource or Distributed Curtailment Resource within the Distributed Energy Resource Aggregation. All information provided to the CAISO by a Distributed Energy Resource Provider regarding the operational and technical characteristics of its Distributed Energy Resource Aggregation(s) must be accurate.

As further described in the Business Practice Manual, the CAISO will share any necessary information and data about the Distributed Energy Resources comprising a Distributed Energy Resource Aggregation with the applicable Utility Distribution Company or Metered Subsystem. The Utility Distribution Company or Metered Subsystem will have an opportunity to provide written comments within thirty (30) days regarding the accuracy of the information about Distributed Energy Resources comprising a Distributed Energy Resource Aggregation(s) or raise concerns with respect to whether the Distributed Energy Resources (1) are participating in another Distributed Energy Resource Aggregation; (2) are participating as a Proxy Demand Response resource or a Reliability Demand Response Resource; (3) do not comply with applicable Utility Distribution Company tariffs or requirements of the relevant Local Regulatory Authority; (4) receive compensation from retail programs for capacity, Energy, or other services that would be offered to the CAISO Markets; or (5) may pose a significant threat to the safe and reliable operation of the Distribution System, if operated as part of a Distributed Energy Resource Aggregation. The Utility Distribution Company or Metered Subsystem review of criterion (5) must be limited to those impacts resulting from the aggregation, exclusive of issues previously considered during the

interconnection study process for each Distributed Energy Resource. The CAISO will provide the Distributed Energy Resource Provider with the Utility Distribution Company or Metered Subsystem's written comments and any other information regarding the Distributed Energy Resources provided by the Utility Distribution Company or Metered Subsystem to CAISO, and the Distributed Energy Resource Provider will resolve any concerns with the Utility Distribution Company or Metered Subsystem prior to the CAISO allowing the individual Distributed Energy Resource to participate in a Distributed Energy Resource Aggregation. Parties may resolve any disputes regarding any issues related to the distribution utility review process with the applicable Governmental Authority for the Utility Distribution Company or Metered Subsystem or under Section 13 of the CAISO tariff, as applicable to the dispute.

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#### **Appendix B.21**

#### **Distributed Energy Resource Provider Agreement**

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**4.1.4 Small Utility Limits.** A Distributed Energy Resource Provider that aggregates Distributed Energy Resources that are customers of utilities that distribute (four million MWh or less in the previous fiscal year must certify to the CAISO that its participation is permitted by the Local Regulatory Authority applicable to Distributed Energy Resources, and that it has satisfied all applicable rules and regulations of the Local Regulatory Authority. Distributed Energy Resource Providers that met this requirement previously must notify the CAISO immediately if the Local Regulatory Authority prohibits participation.

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**SCHEDULE 3**  
**CAISO IMPOSED PENALTIES AND SANCTIONS**  
**[Section 5.1]**  
**TO BE INSERTED UPON FERC APPROVAL**

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**SCHEDULE 4**  
**COMMUNICATION AND DATA PROTOCOLS**



*(This document shows redlines submitted in the August 15, 2022 filing as accepted text.)*

**Attachment B – Marked Tariff**

**Amendment to August 15, 2022 Compliance Filing**

**California Independent System Operator Corporation**

**January 10, 2023**

## Section 4

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As further described in the Business Practice Manual, the CAISO will share any necessary information and data about the Distributed Energy Resources comprising a Distributed Energy Resource Aggregation with the applicable Utility Distribution Company or Metered Subsystem ~~regarding information provided about Distributed Energy Resources comprising a Distributed Energy Resource Aggregation(s).~~ The Utility Distribution Company or Metered Subsystem will have an opportunity to provide written comments within thirty (30) days regarding the accuracy of the information about Distributed Energy Resources comprising a Distributed Energy Resource Aggregation(s) or raise concerns with respect to whether the Distributed Energy Resources (1) are participating in another Distributed Energy Resource Aggregation; (2) are participating as a Proxy Demand Response resource or a Reliability Demand Response Resource; (3) do not comply with applicable Utility Distribution Company tariffs or requirements of the relevant Local Regulatory Authority; (4) receive compensation from retail programs for capacity, Energy, or other services that would be offered to the CAISO Markets; or (5) may pose a significant threat to the safe and reliable operation of the Distribution System, if operated as part of a Distributed Energy Resource Aggregation. The Utility Distribution Company or Metered Subsystem review of criterion (5)

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**CAISO IMPOSED PENALTIES AND SANCTIONS**  
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