



January 24, 2023

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

**Re: California Independent System Operator Corporation
Amended Filing to Comply with Order No. 676-J
Docket Nos. ER23-426-___; RM05-5-029; RM05-5-030**

Dear Secretary Bose:

The California Independent System Operator Corporation (CAISO)¹ submits this amended compliance filing to incorporate by reference certain Version 003.3 Standards for Business Practices and Communication Protocols of the Wholesale Electric Quadrant (WEQ) adopted by the North American Energy Standards Board (NAESB) and as incorporated by reference into the Commission's regulations in Order No. 676-J in the above referenced docket.² The CAISO requests that the Commission accept the enclosed tariff revisions to incorporate these NAESB standards into its tariff by reference, using an open-ended effective date of 12/31/9998.³

The CAISO also seeks leave to submit this compliance filing out of time. Due to an administrative oversight, and the fact that the CAISO currently has a waiver of the WEQ-001⁴ and WEQ-002 standards that include the changes required by the March 2, 2022 deadline, a compliance filing was not submitted at that time.

¹ Capitalized terms not otherwise defined herein have the meanings set forth in appendix A to the CAISO tariff.

² *Standards for Bus. Practices & Commc'n Protocols for Pub. Utils.*, Order No. 676-J, 175 FERC ¶ 61,139 (2021) ("Order No. 676-J"). This amended compliance filing is made with respect to the WEQ cybersecurity and Parallel Flow Visualization standards identified in Appendix I of Order No. 676-J. The CAISO will submit a separate compliance filing with respect to the remaining WEQ Versions 003.3 Standards in a timely manner later this year.

³ As discussed below, the CAISO also is filing a corresponding amended waiver petition regarding the WEQ-001 and WEQ-002 requirements listed in Appendix I of Order No. 676-J.

⁴ The CAISO has a comprehensive waiver for the WEQ-001 standard, with the exception of the

I. Background

In Order No. 676-J, the Commission amended its regulations to incorporate by reference the latest version (Version 003.3) of specified business practice standards that NAESB filed with the Commission on March 30, 2020. The Version 003.3 NAESB standards include updates to standards that the Commission previously incorporated by reference into its regulations.

The Version 003.3 standards include revisions related to the surety assessment on cybersecurity performed by Sandia National Laboratories designed to strengthen the practices and cybersecurity protections established within the standards.⁵ The standards also include revisions to support new OASIS functionality that will allow for the posting of third party offers of planning redispatch services as well as providing additional information regarding the curtailment of firm transmission service.⁶ The standards also include changes that were made to support consistency with the North American Electric Reliability Corporation (NERC) Reliability Standards.⁷ The standards also include additions, revisions, and reservations made to the WEQ-008 Transmission Load Relief (TLR) – Eastern Interconnection Business Practice Standards, which NAESB advises completes the standards development effort for the Parallel Flow Visualization (PFV) enhanced congestion management process.⁸ The standards also include five additional revisions to the OASIS suite of standards that were not made in response to Commission orders.⁹ In addition, the standards include revisions to the NAESB WEQ-023 Modeling Business Practice Standards.¹⁰ Finally, the Commission also revised 18 C.F.R. § 37.6(b)(2)(i) to codify that the calculation of Available Transfer Capability (ATC) must be conducted in manner that is transparent, consistent with system conditions and outages for the relevant timeframe, and not unduly discriminatory or preferential.¹¹

requirements set forth in WEQ-001-13.1.1, WEQ-001-13.1.4, WEQ-001-13.1.5, and WEQ-001-16.

⁵ Order No. 676-J at P 11.

⁶ *Id.* at P 12.

⁷ *Id.* at P 13.

⁸ *Id.* at P 14.

⁹ *Id.* at P 15.

¹⁰ *Id.* at P 16.

¹¹ *Id.* at P 38.

Order No. 676-J requires public utilities to revise their open access transmission tariffs to include the WEQ Version 003.3 Standards in two separate compliance filings. Specifically, in accordance with the schedule set forth in Order No. 676-J, public utilities are required to submit compliance filings for the WEQ cybersecurity standards and the PFV standards nine months after the publication of Order No. 676-J in the Federal Registry (*i.e.*, March 2, 2022). Public utilities' compliance filings for the rest of the WEQ Version 003.3 Standards are due twelve months after implementation of the WEQ Version 003.2 Standards, or no earlier than October 27, 2022.

II. Proposed Tariff Revisions

In accordance with Order No. 676-J, the CAISO has revised tariff section 7.3.3 to incorporate by reference WEQ-000 as set out in Appendix I of Order No. 676-J and 18 C.F.R. § 38.1 (2022). The CAISO also has incorporated by reference WEQ-008; however, this standard is inapplicable to the CAISO because it does not reside in the Eastern Interconnection. The CAISO also has revised tariff section 7.3.3 to list the WEQ-001 and WEQ-002 standards for which the CAISO has requested waiver, pursuant to the amended petition for waiver it is submitting the same day as this compliance filing. Adoption of the NAESB standards identified in Appendix I of Order No. 676-J does not require any substantive changes or revisions to the existing provisions of the CAISO tariff.

III. Effective Date

Pursuant to the directives in Order No. 676-J, the CAISO requests that the Commission accept the tariff revisions contained in this amended filing with an open-ended effective date of 12/31/9998.

IV. Communications

Under Rule 203(b)(3),¹² the CAISO respectfully requests that all correspondence and other communications about this filing be served upon:

¹² 18 C.F.R. § 385.203(b)(3).

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V. Contents of this Filing

In addition to this transmittal letter, this amended filing includes the following attachments:

Attachment A	Clean CAISO tariff sheets incorporating the compliance changes described above
Attachment B	Red-lined document showing the revisions contained in this amended compliance filing ¹³

VI. Conclusion

For the reasons set forth in this amended filing, the CAISO respectfully requests that the Commission accept the tariff revisions contained in the filing as compliant with Order No. 676-J, with an open-ended effective date of 12/31/9998.

Respectfully submitted,

/s/ John E. Spomer

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¹³ Due to an administrative error, the same baseline tariff language was not used in docket numbers ER21-2496-000 (version 8.0.0), ER21-2496-001 (version 8.1.0), and ER21-2496-002 (the currently effective version 8.2.0). Therefore, the redlines in this filing include additional redlines that reflect the changes across these versions.

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 24th day of January, 2023.

/s/ Jacqueline Meredith

Jacqueline Meredith
An employee of the California ISO

Attachment A – Clean Tariff

NAESB Standards – Amended Compliance Filing

California Independent System Operator Corporation

January 24, 2023

7.3.3 NAESB Standards

The following standards of the Wholesale Electric Quadrant (WEQ) of the North American Energy Standards Board (NAESB) are incorporated by reference, except to the extent FERC has granted waiver of such NAESB WEQ standards:

- WEQ-000, Abbreviations, Acronyms, and Definition of Terms, WEQ Version 003.1, September 30, 2015 (including only the definitions of Interconnection Time Monitor, Time Error, and Time Error Correction);
- WEQ-000, Abbreviations, Acronyms, and Definition of Terms (WEQ Version 003.2, Dec. 8, 2017) (with minor correction applied July 23, 2019);
- WEQ-000, Abbreviations, Acronyms, and Definition of Terms (WEQ Version 003.3, March 30, 2020) (in accordance with paragraphs 49 to 51 of Commission Order No. 676-J, only the business practice standards in WEQ-000 that are included in the WEQ cybersecurity standards described in footnote 70 of Order No. 676-J);
- WEQ-001, Open Access Same-Time Information Systems (OASIS), [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017), excluding standards WEQ-001-9 preamble text, WEQ-001-10 preamble text, and exclusively as to standards WEQ-001-13.1.1, 001-13.1.4, 001-13.1.5, and 001-16;
- WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocols (S&CP), [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-003, Open Access Same-Time Information Systems (OASIS) Data Dictionary, [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017) (with minor corrections applied July 23, 2019);
- WEQ-004, Coordinate Interchange (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-005, Area Control Error (ACE) Equation Special Cases (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-006, Manual Time Error Correction (WEQ Version 003.1, Sept. 30, 2015);
- WEQ-007, Inadvertent Interchange Payback (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-008, Transmission Loading Relief (TLR)—Eastern Interconnection (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-008, Transmission Loading Relief (TLR) – Eastern Interconnection (WEQ Version 003.3, March 30, 2020) (in accordance with paragraphs 49 to 51 of Commission Order No. 676-J, only the business practice standards in WEQ-008 included in the PFV Standards as defined in Order No. 676-J);
- WEQ-011, Gas/ Electric Coordination (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-012, Public Key Infrastructure (PKI) (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-013, Open Access Same-Time Information Systems (OASIS) Implementation Guide, [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017);

- WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-021, Measurement and Verification of Energy Efficiency Products (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-022, Electric Industry Registry Business Practice Standards (WEQ Version 003.2, Dec. 8, 2017); and
- WEQ-023, Modeling. The following standards are incorporated by reference: WEQ-023-5; WEQ-023-5.1; WEQ-023-5.1.1; WEQ-023-5.1.2; WEQ-023-5.1.2.1; WEQ-023-5.1.2.2; WEQ-023-5.1.2.3; WEQ-023-5.1.3; WEQ-023-5.2; WEQ-023-6; WEQ-023-6.1; WEQ-023-6.1.1; WEQ-023-6.1.2; and WEQ-023-A Appendix A. (WEQ Version 003.2, Dec. 8, 2017).

Pursuant to FERC's Order on Compliance and Request for Waivers, Docket Nos. _____ and _____ (_____), the CAISO has been granted a waiver of the following NAESB WEQ standards:

- WEQ-001, Open Access Same-Time Information Systems (OASIS), [OASIS] Version 2.2 (WEQ Version 003.3, March 30, 2020), excluding standards WEQ-001-9 preamble text, WEQ-001-10 preamble text, and except as set forth above;
- WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocols (S&CP), [OASIS] Version 2.2 (WEQ Version 003.3, March 30, 2020);
- WEQ-003, Open Access Same-Time Information Systems (OASIS) Data Dictionary, [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017) (with minor corrections applied July 23, 2019);
- WEQ-006, Manual Time Error Correction (WEQ Version 003.1, Sept. 30, 2015) and only as to standards WEQ-006-5 and 006-9;
- WEQ-012, Public Key Infrastructure (PKI) (WEQ Version 003.2, Dec. 8, 2017) to the extent it applies to OASIS applications;
- WEQ-013, Open Access Same-Time Information Systems (OASIS) Implementation Guide, [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017); and
- WEQ-023, Modeling; specifically, standards WEQ-023-5; WEQ-023-5.1; WEQ-023-5.1.1; WEQ-023-5.1.2; WEQ-023-5.1.2.1; WEQ-023-5.1.2.2; WEQ-023-5.1.2.3; WEQ-023-5.1.3; WEQ-023-5.2; WEQ-023-6; WEQ-023-6.1; WEQ-023-6.1.1; WEQ-023-6.1.2; and WEQ-023-A Appendix A. (WEQ Version 003.2, Dec. 8, 2017).

Attachment B – Marked Tariff
NAESB Standards – Amended Compliance Filing
California Independent System Operator Corporation
January 24, 2023

7.3.3 NAESB Standards

The following standards of the Wholesale Electric Quadrant (WEQ) of the North American Energy Standards Board (NAESB) are incorporated by reference, except to the extent FERC has granted waiver of such NAESB WEQ standards:

- WEQ-000, Abbreviations, Acronyms, and Definition of Terms, ~~standard-WEQ-000-2~~ (WEQ] Version 003.1, September 30, 2015 ~~(~~), including only the definitions of Interconnection Time Monitor, Time Error, and Time Error Correction);
- WEQ-000, Abbreviations, Acronyms, and Definition of Terms (WEQ] Version 003.2, Dec. 8, 2017) (with minor correction applied July 23, 2019);
- WEQ-000, Abbreviations, Acronyms, and Definition of Terms (WEQ Version 003.3, March 30, 2020) (in accordance with paragraphs 49 to 51 of Commission Order No. 676-J, only the business practice standards in WEQ-000 that are included in the WEQ cybersecurity standards described in footnote 70 of Order No. 676-J);
- WEQ-001, Open Access Same-Time Information Systems (OASIS), [OASIS] Version 2.2 (WEQ] Version 003.2, Dec. 8, 2017), excluding standards WEQ-001-9 preamble text, WEQ-001-10 preamble text, and exclusively as to standards WEQ-001-13.1.1, 001-13.1.4, 001-13.1.5, and 001-16;
- WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocols (S&CP), [OASIS] Version 2.2 (WEQ] Version 003.2, Dec. 8, 2017);
- WEQ-003, Open Access Same-Time Information Systems (OASIS) Data Dictionary, [OASIS] Version 2.2 (WEQ] Version 003.2, Dec. 8, 2017) (with minor corrections applied July 23, 2019);
- WEQ-004, Coordinate Interchange (WEQ] Version 003.2, Dec. 8, 2017);
- WEQ-005, Area Control Error (ACE) Equation Special Cases (WEQ] Version 003.2, Dec. 8, 2017);
- WEQ-006, Manual Time Error Correction (WEQ] Version 003.1, Sept. 30, 2015);
- WEQ-007, Inadvertent Interchange Payback (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-008, Transmission Loading Relief (TLR)—Eastern Interconnection (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-008, Transmission Loading Relief (TLR) – Eastern Interconnection (WEQ] Version 003.3, March 30, 2020) (in accordance with paragraphs 49 to 51 of Commission Order No. 676-J, only the business practice standards in WEQ-008 included in the PFV Standards as defined in Order No. 676-J] Version 003.2, Dec. 8, 2017);
- WEQ-011, Gas/ Electric Coordination (WEQ] Version 003.2, Dec. 8, 2017);-
- WEQ-012, Public Key Infrastructure (PKI) (WEQ] Version 003.2, Dec. 8, 2017);

- WEQ-013, Open Access Same-Time Information Systems (OASIS) Implementation Guide, [OASIS] Version 2.2 (~~{WEQ} Version 003.2, Dec. 8, 2017~~);
- WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response (~~{WEQ} Version 003.2, Dec. 8, 2017~~);–
- WEQ-021, Measurement and Verification of Energy Efficiency Products (~~{WEQ} Version 003.2, Dec. 8, 2017~~);
- WEQ-022, Electric Industry Registry Business Practice Standards (~~{WEQ} Version 003.2, Dec. 8, 2017~~); and
- WEQ-023, Modeling. ~~The following ({WEQ} Version 003.2, Dec. 8, 2017), including only:~~ standards are incorporated by reference: WEQ-023-5; WEQ-023-5.1; WEQ-023-5.1.1; WEQ-023-5.1.2; WEQ-023-5.1.2.1; WEQ-023-5.1.2.2; WEQ-023-5.1.2.3; WEQ-023-5.1.3; WEQ-023-5.2; WEQ-023-6; WEQ-023-6.1; WEQ-023-6.1.1; WEQ-023-6.1.2; and WEQ-023-A Appendix A. (WEQ Version 003.2, Dec. 8, 2017).

Pursuant to FERC's Order on Compliance and Request for Waivers, Docket Nos.

ER21-2495-000 and (), ER21-2496-001 (March 7, 2022), the CAISO has been granted a waiver of the following NAESB WEQ standards:

- WEQ-001, Open Access Same-Time Information Systems (OASIS), [OASIS] Version 2.2 (~~{WEQ} Version 003.3, March 30, 20202, Dec. 8, 2017~~), excluding standards WEQ-001-9 preamble text, WEQ-001-10 preamble text, and except as set forth above;
- WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocols (S&CP), [OASIS] Version 2.2 (~~{WEQ} Version 003.3, March 30, 20202, Dec. 8, 2017~~);
- WEQ-003, Open Access Same-Time Information Systems (OASIS) Data Dictionary, [OASIS] Version 2.2 (~~{WEQ} Version 003.2, Dec. 8, 2017~~) (with minor corrections applied July 23, 2019);
- WEQ-006, Manual Time Error Correction (~~{WEQ} Version 003.1, Sept. 30, 2015~~) and only as to standards WEQ-006-5 and 006-9;
- WEQ-012, Public Key Infrastructure (PKI) (~~{WEQ} Version 003.2, Dec. 8, 2017~~) to the extent it applies to OASIS applications;–
- WEQ-013, Open Access Same-Time Information Systems (OASIS) Implementation Guide, [OASIS] Version 2.2 (~~{WEQ} Version 003.2, Dec. 8, 2017~~); and
- WEQ-023, Modeling; specifically, ~~{WEQ} Version 003.2, Dec. 8, 2017~~, ~~including only:~~ standards WEQ-023-5; WEQ-023-5.1; WEQ-023-5.1.1; WEQ-023-5.1.2; WEQ-023-5.1.2.1; WEQ-023-5.1.2.2; WEQ-023-5.1.2.3; WEQ-023-5.1.3; WEQ-023-5.2; WEQ-023-6; WEQ-023-6.1; WEQ-023-6.1.1; WEQ-023-6.1.2; and WEQ-023-A Appendix A. (WEQ Version 003.2, Dec. 8, 2017).