

January 7, 2014

**VIA ELECTRONIC FILING**

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

**Re: California Independent System Operator Corporation,  
Docket No. ER06-615-\_\_\_\_  
Informational Filing per ISO Tariff Section 39.7.1.3.2  
Request for Privileged Treatment Under 18 C.F.R Section 388.112**

Dear Secretary Bose:

Pursuant to Section 39.7.1.3.2 of its tariff, the California Independent System Operator Corporation submits this informational filing containing the rates or formulas used to calculate negotiated default energy bids and major maintenance adders that were implemented or modified in the month of December 2013. This is the second month where major maintenance adders have been allowed to be included as components of start-up or minimum load costs.<sup>1</sup> The filing includes five new and four modified major maintenance adders. No information is being submitted relating to negotiated default energy bids or custom operations and maintenance adders.

**I. REQUEST FOR CONFIDENTIAL TREATMENT**

Section 20.2 of the ISO tariff requires that the ISO treat individual bids from scheduling coordinators as confidential. Negotiated default energy bids and start-up and minimum load costs are components of bids. Accordingly, pursuant to section 20.2 of the ISO tariff, the ISO has labeled the documents included with this filing as confidential. In addition, many of the documents contain proprietary information regarding specific generating units, such as unit efficiency factors, scaling factors, and operation and maintenance costs. For these reasons, the Commission should accord these attachments privileged treatment pursuant to 18 C.F.R. Section 388.112.

---

<sup>1</sup> On October 29, 2013, the Commission accepted the ISO's tariff amendment permitting major maintenance adders to be included in start-up or minimum load costs. *California Indep. Sys. Op. Corp.*, 145 FERC ¶ 61,082 (2013).

## II. CONTENTS OF FILING

This filing is comprised of:

- This Transmittal Letter
- Attachment A Confidential Major Maintenance Adder information

## III. COMMUNICATIONS

Correspondence and other communications regarding this filing should be directed to:

Sidney M. Davies\*  
Assistant General Counsel  
California Independent System  
Operator Corporation  
250 Outcropping Way  
Folsom, CA 95630  
Tel: (916) 351-4400  
Fax: (916) 608-7222  
[sdavies@caiso.com](mailto:sdavies@caiso.com)

Nancy Traweek \*  
Executive Director, System Operations  
California Independent System  
Operator Corporation  
250 Outcropping Way  
Folsom, CA 95630  
Tel: (916) 351-4400  
Fax: (916) 351-2350  
[ntraweek@caiso.com](mailto:ntraweek@caiso.com)

\* Parties designated for service.

## IV. SERVICE

The ISO has served a copy of this filing letter on all parties on the official service list for Commission docket no. ER06-615.

## V. CONCLUSION

For the reasons set forth above, the ISO respectfully requests that the Commission accept this informational filing and accord the attachment to this filing confidential treatment under Section 388.112.

Respectfully submitted,  
**By: /s/ Sidney M. Davies**  
Nancy Saracino  
General Counsel  
Roger E. Collanton  
Deputy General Counsel  
Sidney M. Davies  
Assistant General Counsel  
California Independent System  
Operator Corporation  
250 Outcropping Way  
Folsom, CA 95630  
Tel: (916) 351-4400  
Fax: (916) 608-7222  
[sdavies@caiso.com](mailto:sdavies@caiso.com)

## CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the above-referenced proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, CA this 7<sup>th</sup> day of January, 2014.

*/s/ Anna Pascuzzo*

Anna Pascuzzo

**Informational Filing of Pursuant to CAISO Tariff Section 39.7.1.3.2  
December 6, 2013  
California Independent System Operator Corporation**

**Attachment A  
*Confidential Major Maintenance Adder Information***

**[ATTACHMENT CONSISTS OF PRIVILEGED MATERIAL REDACTED  
PURSUANT TO 18 C.F.R. 388.112]**