



June 3, 2019

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. ER18-641-____
Termination of Quarterly Informational Report**

Dear Secretary Bose:

The Commission's April 12, 2018, order in the above-referenced docket, required the California Independent System Operator Corporation ("CAISO") to submit quarterly reports concerning the status of the Reliability Must-Run ("RMR") and Capacity Procurement Mechanism ("CPM") stakeholder process. Specifically, at Paragraph 49 of the order, the Commission directed the CAISO to:

submit quarterly informational filings on June 1, 2018, and every three months thereafter until the stakeholder process is completed, reporting on the progress of the ongoing stakeholder process addressing RMR and risk of retirement CPM. These reports should include information on whether the process is adhering to proposed timelines, updates on changes to the scope of the shareholder process, and a description of any challenges that may impede progress. [Footnotes omitted.]

The Commission clarified that the CAISO's reporting obligation would terminate once its stakeholder process was complete. i.e. "until the CAISO Board of Governors approves the resulting proposal or CAISO issues a market notice terminating the stakeholder process."¹ The CAISO believes that with the April 22, 2019, filing of its tariff amendment in ER19-1641, the obligation to file quarterly reports has terminated. The April 1, 2019 tariff amendment addresses RMR and risk of retirement CPM, which the CAISO Board of Governors approved on March 27, 2019. This amendment updates and revises the resource retirement process and eliminates the risk of retirement CPM.

¹ Cal. Indep. Sys. Operator Corp., 163 FERC ¶ 61,023 (201) at P49 fn 54.

Instead, resources at risk of retirement but needed for reliability will be eligible for an RMR contract. The April 22, 2019 amendment also modernizes the RMR *pro forma* contract and related tariff provisions and provides needed clarity on when CPM or RMR may be used.

Respectfully submitted

By: /s/ Sidney Mannheim

Roger E. Collanton
General Counsel
Sidney Mannheim
Assistant General Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630
Tel: (916) 608-7144
Fax: (916) 608-7222
smannheim@caiso.com

Attorneys for the California Independent
System Operator Corporation

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, California, this 3rd day of June, 2019.

Is/ Anna Pascuzzo

Anna Pascuzzo