



June 3, 2020

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

**Re: California Independent System Operator Corporation
Compliance Filing
Docket No. ER20-732-____**

Dear Secretary Bose:

The California Independent System Operator Corporation (“CAISO”) submits this filing in compliance with the Federal Energy Regulatory Commission’s (“Commission”) May 19, 2020 order (“May 19 Order”) in this proceeding.¹

I. Background and Discussion

The May 19 Order partially accepted the CAISO’s January 2, 2020 filing, as amended by the CAISO’s March 20, 2020 response to the Commission’s deficiency letter, both made pursuant to Section 205 of the Federal Power Act. In those filings, the CAISO sought to implement tariff revisions to address off-peak deliverability constraints in the generator interconnection process. The May 19 Order accepted the CAISO’s tariff revisions regarding off-peak deliverability in the interconnection process, but rejected tariff revisions tying off-peak deliverability to self-scheduling rights.² The Commission directed the CAISO to make this compliance filing to amend its tariff revisions consistent with how the CAISO explained it would do so in its response to the Commission’s deficiency

¹ *California Independent System Operator Corp.*, 171 FERC ¶ 61,120 (2020).

² *Id.* at PP 42 *et seq.*

letter.³ Consistent with that directive, the CAISO submits the following tariff revisions:

- Removing proposed Sections 30.5.2.2.1 and 30.5.6.1 of the tariff;
- Removing the last paragraph of proposed Section 6.3.2.3 of Appendix DD to the tariff.
- Renaming the proposed term “Economic Only” as “Off-Peak Energy Only,”⁴ defined as “Status for a Generating Facility indicating its expected Energy to the CAISO Controlled Grid during modeled off-peak Load conditions will be subject to curtailment due to transmission constraints.”⁵
- Replacing references of “Economic Only” to “Off-Peak Energy Only.”⁶
- Removing the clause related to self-scheduling rights from the Appendix A definition of “Off-Peak Deliverability Status.”

The CAISO also corrected three non-substantive typographical errors in the original filing.⁷ The CAISO has made no other changes to its proposed tariff revisions.

³ *Id.* at PP 43-44.

⁴ Energy Only is a term already in use for on-peak deliverability, so it is prudent to name and define the off-peak status similarly.

⁵ Appendix A to the CAISO tariff.

⁶ Proposed Sections 4.2.1.2, 4.8, 6.3.2.2, 6.7.2.2, Appendix 1, and Appendix B of Appendix DD to the CAISO tariff.

⁷ Section 6.3.2.2 of Appendix DD to the CAISO tariff referred to “the fuel source *or* source of energy” before the CAISO’s initial filing in this proceeding. In amending that provision, the CAISO added three new references that inadvertently referred to “the fuel source *of* source of energy,” which is nonsensical. The CAISO has corrected the three instances of “of” to “or” consistent with the rest of the tariff.

II. Contents of Filing

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

Attachment A	Clean CAISO tariff sheets incorporating this tariff amendment
Attachment B	Red-lined document showing the revisions contained in this tariff amendment ⁸

III. Conclusion

The CAISO respectfully requests that the Commission approve the tariff modifications in Attachments A and B in compliance with its May 19 Order.

Respectfully submitted,

/s/ William H. Weaver.
Roger E. Collanton
General Counsel
Sidney L. Mannheim
Assistant General Counsel
William H. Weaver
Senior Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630
Tel: (916) 351-4400
Fax: (916) 608-7222
E-mail: bweaver@caiso.com

Counsel for the California Independent System
Operator Corporation

⁸ In this compliance filing, the CAISO is showing tariff language revisions previously proposed in the initial filing as clean underlying language in the red-lined marked tariff document, and showing only revisions proposed in this filing as red-lined changes. See *Tariff Amendment to Implement Deliverability Assessment Methodology Enhancements*, CAISO docket no. ER20-732-000 (Jan 2, 2020), available at <https://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=15435584>.

Attachment A – Clean Tariff
Deliverability Assessment Compliance Filing
California Independent System Operator Corporate
June 3, 2020

Appendix A

* * *

- [Not Used]

* * *

- Off-Peak Deliverability Status

Status for a Generating Facility indicating it can provide expected Energy to the CAISO Controlled Grid during modeled off-peak Load conditions without excessive curtailment due to transmission constraints.

- Off-Peak Energy Only

Status for a Generating Facility indicating its expected Energy to the CAISO Controlled Grid during modeled off-peak Load conditions will be subject to curtailment due to transmission constraints.

* * *

Appendix DD

* * *

Section 4 Independent Study Process

4.2 Determination of Electrical Independence

* * *

4.2.1 Flow Impact Test/Behind-the-Meter Capacity Expansion Criteria

* * *

4.2.1.2 Requirement Set Number Two: for Requests for Independent Study of Behind-the-Meter Capacity Expansion of Generating Facilities

...

(ii) Business criteria.

1) The Deliverability Status (Full Capacity, Partial Capacity or

Energy-Only, and Off-Peak Deliverability Status or Off-Peak Energy Only) of the original Generating Facility will remain the same after the behind-the-meter capacity expansion. The capacity expansion will have Energy-Only, Off-Peak Energy Only Deliverability Statuses unless otherwise specified in this GIDAP, and the original Generating Facility and the behind-the-meter capacity expansion will be metered separately from one another and be assigned separate Resource IDs, except as set forth in (2) below.

* * *

4.8 Generator Interconnection Agreement

An Interconnection Customer in the Independent Study Process that requests Off-Peak Deliverability Status, Partial Capacity or Full Capacity Deliverability Status must still negotiate and execute a GIA reflecting Off-Peak Energy Only and Energy-Only Deliverability Status pursuant to the requirements and timelines set forth in Section 13. Upon the completion of the Deliverability Assessments per Section 4.6, the Interconnection Customer's GIA will be amended as appropriate to reflect the results thereof.

* * *

6.3 Identification of and Cost Allocation for Network Upgrades

* * *

6.3.2 Delivery Network Upgrades.

6.3.2.1 The On-Peak Deliverability Assessment.

* * *

6.3.2.2 Off-Peak Deliverability Assessment.

The CAISO, in coordination with the applicable Participating TO(s), shall perform an Off-Peak Deliverability Assessment for Interconnection Customers selecting Off-Peak Deliverability Status. The Off-Peak Deliverability Assessment will identify transmission upgrades in addition to those Delivery Network Upgrades identified in the On-Peak Deliverability Assessment, if any, for a Group Study or individual Phase I Interconnection Study that includes one or more Location Constrained Resource Interconnection Generators (LCRIG), where the fuel source or source of energy for the LCRIG substantially occurs during off-peak conditions. Interconnection Customers that (i) are not LCRIGs whose fuel source or source of energy substantially occurs off-peak, and (ii) have Full or Partial Capacity Deliverability Status, will receive Off-Peak Deliverability Status without triggering Off-Peak Network Upgrades. Energy Only Interconnection Customers that are not LCRIGs whose fuel source or source of energy substantially occurs off-peak will be Off-Peak Energy Only. LCRIGs whose fuel source or source of energy substantially occurs off-peak will receive Off-Peak Deliverability Status based upon the Off-Peak Deliverability Assessment, regardless of their On-Peak Deliverability Status.

The transmission upgrades identified under this Section shall comprise those needed for the expected output of each proposed new LCRIG or the amount of megawatt increase in the generating capacity of each existing LCRIG as listed by the Interconnection Customer in its Interconnection Request, whether studied individually or as a Group Study, to be deliverable to the aggregate of Load on the CAISO Controlled Grid under the Generation dispatch conditions studied without excessive curtailment. The methodology for the Off-Peak Deliverability Assessment will be published on the CAISO Website or, if applicable, included in a CAISO Business Practice Manual.

The CAISO will perform the Off-Peak Deliverability Assessment to identify Off-Peak Network Upgrades required for Generating Facilities to achieve Off-Peak Deliverability Status, and any such upgrades identified in the Off-Peak Deliverability Assessment as part of the Phase I Interconnection Study shall be estimated in accordance with Section 6.4. The Off-Peak Deliverability Assessment does not convey any right to deliver electricity to any specific customer or Delivery Point, nor guarantee any level of deliverability, or transmission capacity, or avoided curtailment.

The estimated costs of Local Off-Peak Network Upgrades identified in the Off-Peak Deliverability Assessment will be assigned or conditionally assigned to Interconnection Requests selecting Off-Peak Deliverability Status based on the flow impact of each such Generating Facility on the Off-Peak Network Upgrades as determined by the Generation distribution factor methodology set forth in the Off-Peak Deliverability Assessment methodology.

The estimated costs of Area Off-Peak Network Upgrades are for information only and not assigned to any Interconnection Requests.

6.3.2.3 Transition to Off-Peak Deliverability Status

Active CAISO Interconnection Requests received before March 3, 2020 for Energy Only Generating Facilities that would be eligible to receive Off-Peak Deliverability Status pursuant to this Section 6.3.2 will have a one-time opportunity to request Off-Peak Deliverability Status. Notwithstanding any provision of this GIDAP, if such Interconnection Customers request Off-Peak Deliverability Status, the CAISO will study those requests in the next Interconnection Study, and assign any required Local Off-Peak Network Upgrades to them pursuant to this Section 6.3.2, and their Interconnection Studies will be amended to include the assigned costs for those Network Upgrades. Such Interconnection Customers' GIAs, Current Cost Responsibilities, Maximum Cost Responsibilities, and Maximum Cost Exposures also will be amended to reflect the additional costs of assigned Local Off-Peak Network Upgrades.

All CAISO Interconnection Requests for Full Capacity Deliverability Status or Partial Capacity Deliverability Status received before March 3, 2020 will automatically receive Off-Peak Deliverability Status. All CAISO Interconnection Requests received before March 3, 2020 for Generating Facilities that are not Location Constrained Resource Interconnection Generators, regardless of Deliverability Status, will automatically receive Off-Peak Deliverability Status.

* * *

6.7 Phase I Interconnection Study Results Meeting

* * *

6.7.2 Modifications.

6.7.2.1 At any time during the course of the Interconnection Studies, the Interconnection Customer, the applicable Participating TO(s), or the CAISO may identify changes to the planned interconnection that may improve the costs and benefits (including reliability) of the interconnection, and the ability of the proposed change to accommodate the Interconnection Request. To the extent the identified changes are acceptable to the applicable Participating TO(s), the CAISO, and Interconnection Customer, such acceptance not to be unreasonably withheld, the CAISO shall modify the Point of Interconnection and/or configuration in accordance with such changes without altering the Interconnection Request's eligibility for participating in Interconnection Studies.

6.7.2.2 At the Phase I Interconnection Study Results Meeting, the Interconnection Customer should be prepared to discuss any desired modifications to the Interconnection Request. After the issuance of the final Phase I Interconnection Study, but no later than ten (10) Business Days following the Phase I Interconnection Study Results Meeting, the Interconnection Customer shall submit to the CAISO, in writing, modifications to any information provided in the Interconnection Request. The CAISO will forward the Interconnection Customer's modification to the applicable Participating TO(s) within one (1) Business Day of receipt.

Modifications permitted under this Section shall include specifically: (a) a decrease in the electrical output (MW) of the proposed project; (b) modifying the technical parameters associated with the Generating Facility technology or the Generating Facility step-up transformer impedance characteristics; (c) modifying the interconnection configuration; (d) modifying the In-Service Date, Initial Synchronization Date, Trial Operation Date, and/or Commercial Operation Date that meets the criteria set forth in Section 3.5.1.4 and is acceptable to the applicable Participating TO(s) and the CAISO, such acceptance not to be unreasonably withheld; (e) change in Point of Interconnection as set forth in Section 6.7.2.1; (f) change in Deliverability Status to Energy Only Deliverability Status, Partial Capacity Deliverability Status, or a lower fraction of Partial Capacity Deliverability Status; and (g) change from Off-Peak Deliverability Status to Off-Peak Energy Only.

...

**Appendix 1 Interconnection Request
INTERCONNECTION REQUEST**

Provide one copy of this completed form pursuant to Section 7 of this Appendix 1 below.

...

3. Requested Deliverability Statuses are (check one in each category):

On-Peak (for purposes of Net Qualifying Capacity):

Full Capacity (For Independent Study Process and Queue Cluster Process only)

(Note – Deliverability analysis for Independent Study Process is conducted with the next annual Cluster Study)

Partial Deliverability for ___ MW of electrical output (For Independent Study Process and Queue Cluster Process only)

Energy Only

Off-Peak:

Off-Peak Deliverable

Off-Peak Energy Only

...

Appendix B Data Form, Pre- System Impact and Facilities Study

**DATA FORM TO BE PROVIDED BY THE INTERCONNECTION CUSTOMER
PRIOR TO COMMENCEMENT OF THE PHASE II INTERCONNECTION STUDY**

...

Level of Deliverability Status: Choose one of the following:

_____Energy-Only

_____Full Capacity

_____Partial Capacity (expressed in fraction of Full Capacity)

Off-Peak Deliverability Status: Choose one of the following:

_____ Off-Peak Deliverable

_____ Off-Peak Energy Only

Please provide any additional modification request pursuant to Section 6.7.2.2 of Appendix DD

...

Section 30: Bid and Self-Schedule Submission

30.5.2 Supply Bids

* * *

30.5.2.2 Supply Bids for Participating Generators

* * *

For Multi-Stage Generating Resources the Scheduling Coordinator may submit the Transition Times, which cannot be greater than the maximum Transition Time registered in the Master File. To the extent the Scheduling Coordinator does not submit the Transition Time that is a registered feasible transition the CAISO will use the registered maximum Transition Time for that MSG Transition for the specific Multi-Stage Generating Resource.

* * *

30.5.6 Non-Generator Resource Bids

Scheduling Coordinators must ensure that Non-Generator Resource Bids or Bids from resources using Non-Generator Resource Generic Modeling functionality contain the Bid components specified in this Section 30.5 based on how the resource is then participating in the CAISO Markets, namely, whether it is providing Supply, Demand, and/or Ancillary Services Bids. In addition to the Bid components listed in this Section 30.5, Scheduling Coordinators representing Non-Generator Resources may submit Bids including the State of Charge for the Day-Ahead Market to indicate the forecasted starting physical position of the Non-Generator Resource. Scheduling Coordinators representing Non-Generator Resources using Regulation Energy Management must submit Bids compliant with the requirements of Section 8.4.1.2.

Attachment B – Marked Tariff
Deliverability Assessment Compliance Filing
California Independent System Operator Corporate
June 3, 2020

Appendix A

* * *

- Economic Only[Not Used]

~~Status for a Generating Facility that prohibits its Scheduling Coordinator from submitting certain Self-Schedules for Energy, as described in Section 30.5.2.~~

* * *

- Off-Peak Deliverability Status

Status for a Generating Facility indicating it can provide expected Energy to the CAISO Controlled Grid during modeled off-peak Load conditions without excessive curtailment due to transmission constraints, ~~and that allows its Scheduling Coordinator to submit Self-Schedules consistent with the CAISO Tariff.~~

- Off-Peak Energy Only

~~Status for a Generating Facility indicating its expected Energy to the CAISO Controlled Grid during modeled off-peak Load conditions will be subject to curtailment due to transmission constraints.~~

* * *

Appendix DD

* * *

Section 4 Independent Study Process

4.2 Determination of Electrical Independence

* * *

4.2.1 Flow Impact Test/Behind-the-Meter Capacity Expansion Criteria

* * *

4.2.1.2 Requirement Set Number Two: for Requests for Independent Study of Behind-the-Meter Capacity Expansion of Generating Facilities

...

(ii) Business criteria.

- 1) The Deliverability Status (Full Capacity, Partial Capacity or Energy-Only, and Off-Peak Deliverability Status or ~~Economic Only~~Off-Peak Energy Only) of the original Generating Facility will remain the same after the behind-the-meter capacity expansion. The capacity expansion will have Energy-Only, ~~Economic Only~~Off-Peak Energy Only Deliverability Statuses unless otherwise specified in this GIDAP, and the original Generating Facility and the behind-the-meter capacity expansion will be metered separately from one another and be assigned separate Resource IDs, except as set forth in (2) below.

* * *

4.8 Generator Interconnection Agreement

An Interconnection Customer in the Independent Study Process that requests Off-Peak Deliverability Status, Partial Capacity or Full Capacity Deliverability Status must still negotiate and execute a GIA reflecting ~~Economic Only~~Off-Peak Energy Only and Energy-Only Deliverability Status pursuant to the requirements and timelines set forth in Section 13. Upon the completion of the Deliverability Assessments per Section 4.6, the Interconnection Customer's GIA will be amended as appropriate to reflect the results thereof.

* * *

6.3 Identification of and Cost Allocation for Network Upgrades

* * *

6.3.2 Delivery Network Upgrades.

6.3.2.1 The On-Peak Deliverability Assessment.

* * *

6.3.2.2 Off-Peak Deliverability Assessment.

The CAISO, in coordination with the applicable Participating TO(s), shall perform an Off-Peak Deliverability Assessment for Interconnection Customers selecting Off-Peak Deliverability Status. The Off-Peak Deliverability Assessment will identify transmission upgrades in addition to those Delivery Network Upgrades identified in the On-Peak Deliverability Assessment, if any, for a Group Study or individual Phase I Interconnection Study that includes one or more Location Constrained Resource Interconnection Generators (LCRIG), where the fuel source or source of energy for the LCRIG substantially occurs during off-peak conditions. Interconnection Customers that (i) are not LCRIGs whose fuel source ~~of~~ source of energy substantially occurs off-peak, and (ii) have Full or Partial Capacity Deliverability Status, will receive Off-Peak Deliverability Status without triggering Off-Peak Network Upgrades. Energy Only Interconnection Customers

that are not LCRIGs whose fuel source ~~efor~~ source of energy substantially occurs off-peak will be ~~Economic Only~~Off-Peak Energy Only. LCRIGs whose fuel source ~~efor~~ source of energy substantially occurs off-peak will receive Off-Peak Deliverability Status based upon the Off-Peak Deliverability Assessment, regardless of their On-Peak Deliverability Status.

The transmission upgrades identified under this Section shall comprise those needed for the expected output of each proposed new LCRIG or the amount of megawatt increase in the generating capacity of each existing LCRIG as listed by the Interconnection Customer in its Interconnection Request, whether studied individually or as a Group Study, to be deliverable to the aggregate of Load on the CAISO Controlled Grid under the Generation dispatch conditions studied without excessive curtailment. The methodology for the Off-Peak Deliverability Assessment will be published on the CAISO Website or, if applicable, included in a CAISO Business Practice Manual.

The CAISO will perform the Off-Peak Deliverability Assessment to identify Off-Peak Network Upgrades required for Generating Facilities to achieve Off-Peak Deliverability Status, and any such upgrades identified in the Off-Peak Deliverability Assessment as part of the Phase I Interconnection Study shall be estimated in accordance with Section 6.4. The Off-Peak Deliverability Assessment does not convey any right to deliver electricity to any specific customer or Delivery Point, nor guarantee any level of deliverability, or transmission capacity, or avoided curtailment.

The estimated costs of Local Off-Peak Network Upgrades identified in the Off-Peak Deliverability Assessment will be assigned or conditionally assigned to Interconnection Requests selecting Off-Peak Deliverability Status based on the flow impact of each such Generating Facility on the Off-Peak Network Upgrades as determined by the Generation distribution factor methodology set forth in the Off-Peak Deliverability Assessment methodology.

The estimated costs of Area Off-Peak Network Upgrades are for information only and not assigned to any Interconnection Requests.

6.3.2.3 Transition to Off-Peak Deliverability Status

Active CAISO Interconnection Requests received before March 3, 2020 for Energy Only Generating Facilities that would be eligible to receive Off-Peak Deliverability Status pursuant to this Section 6.3.2 will have a one-time opportunity to request Off-Peak Deliverability Status. Notwithstanding any provision of this GIDAP, if such Interconnection Customers request Off-Peak Deliverability Status, the CAISO will study those requests in the next Interconnection Study, and assign any required Local Off-Peak Network Upgrades to them pursuant to this Section 6.3.2, and their Interconnection Studies will be amended to include the assigned costs for those Network Upgrades. Such Interconnection Customers' GIAs, Current Cost Responsibilities, Maximum Cost Responsibilities, and Maximum Cost Exposures also will be amended to reflect the additional costs of assigned Local Off-Peak Network Upgrades.

All CAISO Interconnection Requests for Full Capacity Deliverability Status or Partial Capacity Deliverability Status received before March 3, 2020 will

automatically receive Off-Peak Deliverability Status. All CAISO Interconnection Requests received before March 3, 2020 for Generating Facilities that are not Location Constrained Resource Interconnection Generators, regardless of Deliverability Status, will automatically receive Off-Peak Deliverability Status.

~~Interconnection Customers that achieved their Commercial Operation Date before March 3, 2020 will have Off-Peak Deliverability Status pursuant to Sections 30.5.2.2.1 and 30.5.6.1 of the CAISO Tariff.~~

* * *

6.7 Phase I Interconnection Study Results Meeting

* * *

6.7.2 Modifications.

- 6.7.2.1** At any time during the course of the Interconnection Studies, the Interconnection Customer, the applicable Participating TO(s), or the CAISO may identify changes to the planned interconnection that may improve the costs and benefits (including reliability) of the interconnection, and the ability of the proposed change to accommodate the Interconnection Request. To the extent the identified changes are acceptable to the applicable Participating TO(s), the CAISO, and Interconnection Customer, such acceptance not to be unreasonably withheld, the CAISO shall modify the Point of Interconnection and/or configuration in accordance with such changes without altering the Interconnection Request's eligibility for participating in Interconnection Studies.
- 6.7.2.2** At the Phase I Interconnection Study Results Meeting, the Interconnection Customer should be prepared to discuss any desired modifications to the Interconnection Request. After the issuance of the final Phase I Interconnection Study, but no later than ten (10) Business Days following the Phase I Interconnection Study Results Meeting, the Interconnection Customer shall submit to the CAISO, in writing, modifications to any information provided in the Interconnection Request. The CAISO will forward the Interconnection Customer's modification to the applicable Participating TO(s) within one (1) Business Day of receipt.

Modifications permitted under this Section shall include specifically: (a) a decrease in the electrical output (MW) of the proposed project; (b) modifying the technical parameters associated with the Generating Facility technology or the Generating Facility step-up transformer impedance characteristics; (c) modifying the interconnection configuration; (d) modifying the In-Service Date, Initial Synchronization Date, Trial Operation Date, and/or Commercial Operation Date that meets the criteria set forth in Section 3.5.1.4 and is acceptable to the applicable Participating TO(s) and the CAISO, such acceptance not to be unreasonably withheld; (e) change in Point of Interconnection as set forth in Section 6.7.2.1; (f) change in Deliverability Status to Energy Only Deliverability Status, Partial Capacity Deliverability Status, or a lower fraction of Partial Capacity Deliverability Status; and (g) change from Off-Peak Deliverability Status to ~~Economic-Only~~Off-Peak Energy Only.

...

**Appendix 1 Interconnection Request
INTERCONNECTION REQUEST**

Provide one copy of this completed form pursuant to Section 7 of this Appendix 1 below.

...

3. Requested Deliverability Statuses are (check one in each category):

On-Peak (for purposes of Net Qualifying Capacity):

Full Capacity (For Independent Study Process and Queue Cluster Process only)

(Note – Deliverability analysis for Independent Study Process is conducted with the next annual Cluster Study)

Partial Deliverability for ___ MW of electrical output (For Independent Study Process and Queue Cluster Process only)

Energy Only

Off-Peak:

Off-Peak Deliverable

~~Economic Only~~ Off-Peak Energy Only

...

Appendix B Data Form, Pre- System Impact and Facilities Study

**DATA FORM TO BE PROVIDED BY THE INTERCONNECTION CUSTOMER
PRIOR TO COMMENCEMENT OF THE PHASE II INTERCONNECTION STUDY**

...

Level of Deliverability Status: Choose one of the following:

_____Energy-Only

_____Full Capacity

_____Partial Capacity (expressed in fraction of Full Capacity)

Off-Peak Deliverability Status: Choose one of the following:

_____ Off-Peak Deliverable

_____ ~~Economic-Only~~Off-Peak Energy Only

Please provide any additional modification request pursuant to Section 6.7.2.2 of Appendix DD

...

Section 30: Bid and Self-Schedule Submission

30.5.2 Supply Bids

* * *

30.5.2.2 Supply Bids for Participating Generators

* * *

For Multi-Stage Generating Resources the Scheduling Coordinator may submit the Transition Times, which cannot be greater than the maximum Transition Time registered in the Master File. To the extent the Scheduling Coordinator does not submit the Transition Time that is a registered feasible transition the CAISO will use the registered maximum Transition Time for that MSG Transition for the specific Multi-Stage Generating Resource.

~~**30.5.2.2.1 Off-Peak Deliverability Status for Participating Generators**~~

~~Scheduling Coordinators may submit Self Schedules on behalf of Participating Generators only where the Participating Generator has Off-Peak Deliverability Status. Scheduling Coordinators for Participating Generators with Economic Only status must submit Economic Bids for Energy. Notwithstanding the foregoing, Scheduling Coordinators may submit Energy Self Schedules in the Real-Time Market up to the Participating Generator's Day-Ahead Market Schedule in the same Trading Hour. All Participating Generators in the CAISO Markets before March 3, 2020 have Off-Peak Deliverability Status.~~

* * *

30.5.6 Non-Generator Resource Bids

Scheduling Coordinators must ensure that Non-Generator Resource Bids or Bids from resources using Non-Generator Resource Generic Modeling functionality contain the Bid components specified in this Section 30.5 based on how the resource is then participating in the CAISO Markets, namely, whether it is providing Supply, Demand, and/or Ancillary Services Bids. In addition to the Bid components listed in this Section 30.5, Scheduling Coordinators representing Non-Generator Resources may submit Bids including the State of Charge for the Day-Ahead Market to indicate the forecasted starting physical position of the Non-Generator Resource. Scheduling Coordinators representing Non-Generator Resources using Regulation Energy Management must submit Bids compliant with the requirements of Section 8.4.1.2.

30.5.6.1 ~~Off-Peak Deliverability Status for Non-Generator Resource Bids~~

~~Scheduling Coordinators may submit Self-Schedules on behalf of Non-Generator Resources only where the Non-Generator Resource has Off-Peak Deliverability Status. Scheduling Coordinators for Non-Generator Resources with Economic-Only status must submit Economic Bids for Energy.~~

~~Notwithstanding the foregoing, Scheduling Coordinators may submit Energy Self-Schedules in the Real-Time Market up to the Non-Generator Resource's Day Ahead Market Schedule in the same Trading Hour. All Non-Generator Resources in the CAISO Markets before March 3, 2020 have Off-Peak Deliverability Status.~~

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, 2020.

/s/ Jacqueline Meredith
Jacqueline Meredith