

May 11, 2016

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 Nos. ER15-1825-003 & -004**

Dear Secretary Bose:

The California Independent System Operator Corporation (“CAISO”) submits this filing in compliance with the Commission’s April 29, 2016, order issued in this proceeding.¹

I. Background and Discussion

The April 29 order accepted the CAISO’s April 20, 2016, request for a limited waiver of tariff provisions necessary to allow a delay in the implementation of phase 1A of the two-phase reliability services initiative (RSI). The CAISO has sought several delays to implementation, the most recent of which was presented in the April 20 filing. The April 29 order approved a delay until June 1, 2016, subject to the condition that the CAISO file revised tariff records to reflect the new implementation date.²

The CAISO hereby submits this compliance filing consistent with the Commission’s directive in the April 29 order. Specifically, all tariff revisions accepted by the Commission in its October 1, 2015, order in this proceeding,³ with the exception of sections 40.2.4, 40.10.5.1(a), and 40.10.5.1.1, will now have an effective date of June 1, 2016.

¹ *Cal. Indep. Sys. Operator Corp.*, 155 FERC ¶ 61,116 (2016) (April 29 order).

² *Id.* at P 9.

³ *Cal. Indep. Sys. Operator Corp.*, 153 FERC ¶ 61,002 (2015).

In submitting this compliance filing the CAISO also wishes to inform the Commission of further delays in the market simulation for the paired RSI 1a and capacity procurement mechanism replacement initiatives.⁴ The CAISO's April 20 filing explained that June 1 implementation was contingent on successful execution of the structured market simulation scenarios with sufficient time for market participants to validate simulated settlement statements produced as part of the market simulation. Because of this delay, meeting that milestone is no longer feasible and thus implementation on June 1 is no longer possible. The April 20 filing also noted that the CAISO would seek additional relief from the Commission if it concluded that implementation on June 1 was not possible. The CAISO intends to seek such relief through a forthcoming filing with the Commission.

II. Attachments

The purpose of this filing is only to revise the effective date for the affected tariff records and no tariff language is being changed. Accordingly, no clean or marked tariff attachments are included with this filing.

III. Conclusion

The CAISO respectfully requests that the Commission find that this filing is in compliance with the April 29 order. If there are any questions regarding this filing, please feel free to contact the undersigned.

⁴ The CAISO informed market participants of this delay through a market notice issued on May 10, 2016, available at <http://www.caiso.com/Documents/Early2016ReleaseWeekThreeMarketSimulation-ProductionActivationPostponed-CallToday051016.html>.

Respectfully Submitted,
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CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the captioned 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 Washington, DC, this 11th day of May, 2016.

/s/ Daniel Klein
Daniel Klein