

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**California Independent System  
Operator Corporation**

**Docket No. ER15-1451-\_\_\_\_**

**ANSWER OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

The California Independent System Operator Corporation (“CAISO”) submits this answer to the comments filed in this proceeding on November 13, 2015, by the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (the “Six Cities”).

The Six Cities filed comments on the CAISO’s October 26, 2015, filing to remove tariff provisions allowing convergence bidding on the interties in compliance with the Commission’s September 25, 2015, order in this proceeding.<sup>1</sup> No party opposed the CAISO’s compliance filing. Six Cities agree with the tariff revisions proposed in the CAISO’s October 26 filing, but suggests that one additional modification to section 31.8.2 of the CAISO tariff is appropriate to comply fully with the September 25 order and avoid ambiguity. Specifically, Six Cities propose moving the phrase “which can be physical or virtual” within this section.

The CAISO does not believe the modification proposed by Six Cities is necessary to comply with the Commission’s directives. The CAISO tariff is clear that

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<sup>1</sup> *Cal. Indep. Sys. Operator Corp.*, 152 FERC ¶ 61,234 (2015)(“September 25 order”).

convergence bidding is no longer permitted on the interties without this change. The CAISO has no objection, however, to making the change to section 31.8.2 suggested by Six Cities if directed to do so by the Commission.

The CAISO respectfully requests that the Commission take this answer into account and accept the October 26 compliance filing

Respectfully submitted,

**By: /s/ David Zlotlow**

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Dated: November 30, 2015

## CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service lists in the above-referenced 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 30<sup>th</sup> day of November 2015.

*/s/ Anna Pascuzzo*

Anna Pascuzzo