November 13, 2009

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

Re: California Independent System Operator Corporation  
Docket Nos. ER09-556---, ER08-367---, and ER06-615---  
Filing of ISO Tariff Sheets to Reflect Revised Accepted Effective Date

Dear Secretary Bose:

The California Independent System Operator Corporation ("ISO") hereby submits this informational filing of clean tariff sheets reflecting an effective date of November 12, 2009 for its simplified ramping tariff changes in accordance with the Commission's November 12 letter order in this proceeding.1 The November 12 letter order granted a motion the ISO filed on November 4, 2009 to modify the effective date of the simplified ramping tariff changes from November 5 to November 12. In the November 4 motion, the ISO also committed to file revised tariff sheets reflecting the November 12 effective date following Commission approval. The simplified ramping changes have gone into effect and are performing well. As with any software application, the ISO will continue to monitor performance and advise the Commission and parties of any performance issues as necessary.

1 The simplified ramping tariff changes are contained in Sections 34.5(10), 34.15.1(c), and 34.15.5 of the ISO tariff and are reflected in the clean tariff sheets provided in Attachment A hereto. Background information regarding the simplified ramping tariff changes is provided in the ISO's October 28, 2009 informational filing in this proceeding. The tariff sheets contained in Attachment A hereto are identical to the tariff sheets provided in the October 28 informational filing except for updates to their headers and footers to reflect revised sheet designations and the November 12 effective date.
The ISO respectfully requests that the Commission accept the tariff sheets showing the updated effective date of November 12, 2009. Please contact the undersigned with any questions.

Respectfully submitted,

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Attachment A – Informational Clean Sheets
Modification to the Effective Date of Certain Tariff Revisions
Fourth Replacement CAISO Tariff
ER09-556-002
November 13, 2009
The RTM optimization may result in resources being shut down consistent with their Bids and operating characteristics provided that: (1) the resource does not need to be on-line to provide Energy, (2) the resource is able to start up within the RTM optimization Time Horizon, (3) the Generating Unit is not providing Regulation or Spinning Reserve, and (4) Generating Units online providing Non-Spinning Reserve may be shut down if they can be brought up within ten minutes as such resources are needed to be online to provide Non-Spinning Reserves; and

For resources that are both providing Regulation and have submitted Energy Bids for the RTM, Dispatch Instructions will be based on the Regulation Ramp Rate of the resource rather than the Operational Ramp Rate if the Dispatch Operating Point remains within the Regulating Range. The Regulating Range will limit the Ramping of Dispatch Instructions issued to resources that are providing Regulation.
(c) Operational Ramp Rates and Start-Up Times. The submitted Operational Ramp Rate for resources shall be used as the basis for all Dispatch Instructions, provided that the Dispatch Operating Point for resources that are providing Regulation remains within their applicable Regulating Range. The Regulating Range will limit the Ramping of Dispatch Instructions issued to resources that are providing Regulation. The Ramp Rate for Non-Dynamic System Resources cleared in the HASP will not be observed. Rather, the ramp of the Non-Dynamic System Resource will respect inter-Balancing Authority Area Ramping conventions established by WECC. Ramp Rates for Dynamic System Resources will be observed like Participating Generators in the RTD. Each Energy Bid shall be Dispatched only up to the amount of Imbalance Energy that can be provided within the Dispatch Interval based on the applicable Operational Ramp Rate. The Dispatch Instruction shall consider the relevant Start-Up Time as, if the resource is off-line, the relevant Operational Ramp Rate function, and any other resource constraints or prior commitments such as Schedule changes across hours and previous Dispatch Instructions. The Start-Up Time shall be determined from the Start-Up Time function and when the resource was last shut down. The Start-Up Time shall not apply if the corresponding resource is on-line or expected to start.
of CAISO Dispatch of a resource’s Energy Bid in one Operating Hour to a Dispatch Operating Point such
that the resource cannot return to its successive Operating Hour Schedule or to an infra-marginal
operating point by the beginning of the next Operating Hour is Residual Imbalance Energy and shall be
settled as Instructed Imbalance Energy as provided for in Section 11.5.1 and also may be eligible for
recovery of its applicable Energy Bid Costs in accordance with Section 11.8. Similarly, Energy delivered
or consumed as a result of CAISO Dispatch of a resource’s Energy Bid in a future Operating Hour to a
Dispatch Operating Point different from its current Operating Point prior to the end of the current
Operating Hour is also considered Residual Imbalance Energy and shall be settled as Instructed
Imbalance Energy as provided for in Section 11.5.1 and also may be eligible for recovery of its applicable
Energy Bid Costs in accordance with Section 11.8. When Ramping Energy Deviation and Residual
Imbalance Energy coexist within a given Dispatch Interval, the Ramping Energy Deviation shall be the
portion of Instructed Imbalance Energy that is produced or consumed within the Schedule-change band
defined by the accepted HASP Bids of the two consecutive Settlement Periods; the Residual Imbalance
Energy shall be the portion of Instructed Imbalance Energy that is produced or consumed outside the
Schedule-change band.

34.15.5 Inter-hour Dispatch of Resources Without Real-Time Energy Bids.

Dispatch Instructions shall be issued for each Dispatch Interval as needed to prescribe the ramp between
a resource’s accepted Self-Schedule in one Trading Hour and its accepted Self-Schedule in the
immediately succeeding Trading Hour. Such Dispatch Instructions shall be based on the lesser of: (1) the
applicable Operational Ramp Rate as provided for in Section 30.7.7 and (2) the Ramp Rate associated
with the Standard Ramp. The Dispatch Instructions for Ramping of Generating Units without Real-Time
Energy Bids in both Operating Hours shall ramp the resource between hourly Schedules symmetrically to
the extent possible subject to the Regulation Ramping limitations across hourly boundaries in twenty (20)
to sixty (60) minutes assuming Congestion can be resolved utilizing Economic Bids. The minimum twenty
(20)-minute ramp is required for smooth hourly Schedule changes and is consistent with Intertie.
CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing documents upon each of the parties 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 Washington, D.C. this 13th day of November, 2009.

Bradley R. Milauskas

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