

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

Eastside Power Authority) Docket No. ER15-2588-000

**CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION'S
INTERVENTION AND COMMENTS ON WAIVER REQUEST**

The California Independent System Operator Corporation (CAISO) files this motion to intervene and comments in response to the request submitted on September 1, 2015, by Eastside Power Authority to waive resource adequacy plan reporting penalties called for under the CAISO tariff that otherwise would apply to Western Area Power Administration in its role as Eastside's scheduling coordinator. Eastside asserts that it meets the Commission's rules for granting tariff waiver requests. The CAISO takes no position on the question of whether Eastside meets the Commission's waiver standards. Instead, the CAISO offers these comments on several issues raised in Eastside's filing.

I. MOTION TO INTERVENE

The CAISO is a non-profit public benefit corporation organized under the laws of the State of California. The CAISO's Commission-approved tariff includes provisions regarding the timelines for scheduling coordinators representing load-serving entities to submit monthly resource adequacy plans. The CAISO tariff additionally contains penalty provisions for scheduling coordinators that do not meet these timelines. Because the CAISO has an interest in this proceeding that cannot be represented adequately by any other

party, the CAISO requests that the Commission permit it to intervene in this proceeding.

II. BACKGROUND ON RESOURCE ADEQUACY PLAN REPORTING

The resource adequacy program is a critical element to meeting grid reliability within the CAISO footprint. The CAISO administers the program in conjunction with the California Public Utilities Commission and other local regulatory authorities within the CAISO footprint. As part of the program, scheduling coordinators representing load-serving entities must submit monthly resource adequacy plans to the CAISO.¹ The monthly plans, which are due to the CAISO 45 days before the start of the month to which they apply, indicate which resources the load serving entity will rely on to satisfy its resource adequacy requirements.

The CAISO tariff has a general penalty provision that imposes a \$500 penalty for each day that “information that is required to be submitted to the CAISO under the CAISO Tariff” is late.² This penalty provision applies to late resource adequacy plans.

III. COMMENTS

The processes and procedures underlying the resource adequacy program are an important element of that program. Without timely reports from load serving entities the CAISO cannot know whether the load serving entities

¹ CAISO tariff section 40.2.2.4. Scheduling coordinators representing load-serving entities also must submit annual resource adequacy plans.

² CAISO tariff section 37.6.1.

within its footprint have secured sufficient capacity with adequate notice to take corrective action, such as issuing a capacity procurement mechanism designation under section 43 of the CAISO tariff, in the event that there are deficiencies. The CAISO thus believes it is important that all parties meet their resource adequacy reporting obligations. Further, in this case the CAISO is confident that it applied its tariff correctly and that, per the relevant tariff provisions, Eastside faced the appropriate sanctions.

The CAISO also notes that the second phase of its reliability services initiative potentially will explore ways to ease the resource adequacy reporting burden for load serving entities, particularly small utilities that are reporting small amounts of capacity.³ Considering resource adequacy reporting rule changes in this venue will allow the CAISO and entities like Eastside, along with all other interested stakeholders, the opportunity to consider changes in reporting obligations in the context of more comprehensive resource adequacy rule changes. To the degree the Commission views Eastside's filing as raising the potential for prospective tariff changes, the CAISO believes it already has a venue to consider any appropriate amendments.

³ Information about this stakeholder process is available at:
<http://www.caiso.com/informed/Pages/StakeholderProcesses/ReliabilityServices.aspx>.

IV. CONCLUSION

The CAISO takes no position on the issue of whether Eastside merits a tariff waiver in these circumstances. Instead, the CAISO reiterates its view that it properly implemented its tariff and that an existing stakeholder initiative will provide an opportunity to consider any appropriate prospective rule changes.

Respectfully submitted,

By: /s/ David S. Zlotlow

Roger E. Collanton
General Counsel
Anna A. McKenna
Assistant General Counsel
David S. Zlotlow
Senior Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630
Tel: (916) 351-4400
Fax: (916) 608-7222
dzlotlow@caiso.com

Counsel for the California Independent
System Operator Corporation

Date: September 22, 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 22th day of September 2015.

/s/ Anna Pascuzzo

Anna Pascuzzo