



September 29, 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. ER20-1890-____**

Dear Secretary Bose:

The California Independent System Operator Corporation (“CAISO”) submits this filing in compliance with the Federal Energy Regulatory Commission’s (“Commission”) September 17, 2020, order in this proceeding.¹

I. Background and Discussion

The September 17 Order accepted the CAISO’s May 22 filing in this proceeding, subject to a compliance filing to be submitted within 30 days. In the comments it filed in this proceeding on June 12, the CAISO’s Department of Market Monitoring (DMM) noted potential ambiguities in the proposed tariff amendments that could be interpreted to run counter to the CAISO’s stated policy intent in this filing. Specifically, DMM was concerned that the proposed tariff language could be interpreted to allow market participants to zero out their fifteen minute market awards after they have seen the prices for some fifteen minute market intervals. In its June 29 response to comments, the CAISO clarified that this was not its intent and agreed to make several clarifying changes if so ordered to do so by the Commission on compliance. The Commission’s September 17 Order agreed with both the CAISO and DMM that additional clarity would be beneficial and ordered the CAISO to submit a compliance filing to implement the proposed clarifications offered in the June 29 response.²

¹ *Cal. Indep. Sys. Operator Corp.*, 172 FERC ¶ 61,234 (2020) (September 17 Order).

² *Id.* at P 25.

In compliance with the Commission's directive, the CAISO submits the attached amendments to sections 30.5.7.1 through 30.5.7.5 of its tariff. The CAISO has made no other changes to its proposed tariff revisions. Pursuant to a separate contemporaneous waiver filing, the CAISO is seeking to delay implementation of the tariff provisions approved in the September 17 Order from October 1, 2020, to January 1, 2021. Accordingly, the CAISO is proposing a January 1, 2021, effective date for these amendments.

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 ³ |

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/ 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
E-mail: dzlotlow@caiso.com

Counsel for the California Independent System
Operator Corporation

³ In this compliance filing, the CAISO is showing tariff language revisions approved through the September 17 Order as clean underlying language in the red-lined marked tariff document, and showing only revisions proposed in this filing as red-lined changes.

Attachment A – Clean Tariff

Compliance Filing

California Independent System Operator Corporation

September 29, 2020

30.5.7 E-Tag Rules and Treatment of Intertie Schedules

In addition to complying with all generally applicable E-Tagging requirements, Scheduling Coordinators must submit their E-Tags consistent with the requirements specified in this Section 30.5.7. If a Scheduling Coordinator receives an intra-hour Schedule change, then the Scheduling Coordinator must, by twenty minutes before the start of the FMM interval to which the Schedule change applies, ensure that an updated energy profile reflects the change. Absent extenuating circumstances, the CAISO automatically updates Energy profiles on E-Tags for Energy Schedules that change from HASP to the FMM within a Trading Hour. In performing this service for a Scheduling Coordinator, the CAISO does not assume any responsibility for compliance with any E-Tag requirements or obligations to which the Scheduling Coordinator is subject. The changed energy profile will apply for the balance of the operating hour unless it is subsequently changed by a further updated energy profile.

30.5.7.1 Self-Schedule Hourly Blocks

By forty minutes prior to the applicable Trading Hour, the Scheduling Coordinator must submit an E-Tag (or set of E-Tags) that passes CAISO E-Tag validation procedures and that supports the Self-Schedule Hourly Block. If the Scheduling Coordinator fails to submit a valid E-Tag by forty minutes prior to the applicable Trading Hour, then the CAISO will set the MW quantity of the FMM Schedule associated with the Self-Schedule Hourly Block to zero for each FMM interval of the hour.

The transmission profile of the E-Tag at forty minutes prior to the applicable Trading Hour must be equal to the Self-Schedule Hourly Block. If the Scheduling Coordinator has a transmission profile less than its advisory Energy schedule, then the CAISO will limit the schedule for Energy in the FMM so that it does not exceed the quantity of the transmission profile.

The energy profile of the E-Tag at forty minutes prior to the applicable Trading Hour need not equal the Self-Schedule Hourly Block and the Scheduling Coordinator may revise the Energy profile up to twenty minutes prior to the applicable Trading Hour. At twenty minutes prior to the applicable Trading Hour, the quantity of the Energy profile must be equal to the lower of: (a) the transmission profile of the E-Tag at forty minutes prior to the applicable Trading Hour; or (b) the Self-Schedule Hourly Block. A Scheduling Coordinator is exposed to the Under/Over Delivery Charge if the Energy profile at twenty minutes prior to the applicable Trading Hour is not equal to the Self-Schedule Hourly Block.

The CAISO may modify the Energy profile due to Reliability related curtailments.

30.5.7.2 Variable Energy Resource Self-Schedule

By forty minutes prior to the applicable Trading Hour, the Scheduling Coordinator must submit an E-Tag (or set of E-Tags) that passes CAISO E-Tag validation procedures and that supports the Variable Energy Resource Self-Schedule. If the Scheduling Coordinator fails to submit a valid E-Tag by forty minutes prior to the applicable Trading Hour, then the CAISO will set the MW quantity of the FMM Schedule associated with the Variable Energy Resource Self-Schedule to zero for each FMM interval of the hour.

The transmission profile of the E-Tag at forty minutes prior to the applicable Trading Hour must be equal to the Variable Energy Resource Self-Schedule. If the Scheduling Coordinator has a transmission profile less than its advisory Energy schedule, then the CAISO will limit the schedule for Energy in the FMM so that it does not exceed the quantity of the transmission profile.

The energy profile of the E-Tag at forty minutes prior to the applicable Trading Hour need not equal the Variable Energy Resource Self-Schedule and the Scheduling Coordinator may revise the Energy profile up to twenty minutes prior to the applicable Trading Hour. At twenty minutes prior to the applicable Trading Hour, the quantity of the Energy profile must be equal to the lower of: (a) the transmission profile of the E-Tag at forty minutes prior to the applicable Trading Hour; or (b) the Variable Energy Resource Self-Schedule. A Scheduling Coordinator is exposed to the Under/Over Delivery Charge if the Energy profile at twenty minutes prior to the applicable Trading Hour is not equal to the Variable Energy Resource Self-Schedule.

The CAISO may modify the Energy profile due to Reliability related curtailments.

30.5.7.3 Economic Hourly Block Bid

By forty minutes prior to the applicable Trading Hour, the Scheduling Coordinator must submit an E-Tag (or set of E-Tags) that passes CAISO E-Tag validation procedures and that supports the Economic Hourly Block Bid. If the Scheduling Coordinator fails to submit a valid E-Tag by forty minutes prior to the applicable Trading Hour, then the CAISO will set the MW quantity of the FMM Schedule associated with the Economic Hourly Block Bid to zero for each FMM interval of the hour.

The transmission profile of the E-Tag at forty minutes prior to the applicable Trading Hour must be equal to the Economic Hourly Block Bid. If the Scheduling Coordinator has a transmission profile less than its

advisory Energy schedule, then the CAISO will limit the schedule for Energy in the FMM so that it does not exceed the quantity of the transmission profile.

The energy profile of the E-Tag at forty minutes prior to the applicable Trading Hour need not equal the Economic Hourly Block Bid and the Scheduling Coordinator may revise the Energy profile up to twenty minutes prior to the applicable Trading Hour. At twenty minutes prior to the applicable Trading Hour, the quantity of the Energy profile must be equal to the lower of: (a) the transmission profile of the E-Tag at forty minutes prior to the applicable Trading Hour; or (b) the quantity of the Economic Hourly Block Bid. A Scheduling Coordinator is exposed to the Under/Over Delivery Charge if the Energy profile at twenty minutes prior to the applicable Trading Hour is not equal to the Economic Hourly Block Bid.

The CAISO may modify the Energy profile due to Reliability related curtailments.

30.5.7.4 Economic Hourly Block Bid with Intra-Hour Option

By forty minutes prior to the applicable Trading Hour, the Scheduling Coordinator must submit an E-Tag (or set of E-Tags) that passes CAISO E-Tag validation procedures and that supports the Economic Hourly Block Bid with Intra-Hour Option. If the Scheduling Coordinator fails to submit a valid E-Tag by forty minutes prior to the applicable Trading Hour, then the CAISO will set the MW quantity of the FMM Schedule associated with the Economic Hourly Block Bid with Intra-Hour Option to zero for each FMM interval of the hour.

The transmission profile of the E-Tag at forty minutes prior to the applicable Trading Hour must be equal to the Economic Hourly Block Bid with Intra-Hour Option. If the Scheduling Coordinator has a transmission profile less than its advisory Energy schedule, then the CAISO will limit the schedule for Energy in the FMM so that it does not exceed the quantity of the transmission profile.

The energy profile of the E-Tag at forty minutes prior to the applicable Trading Hour need not equal the Economic Hourly Block Bid with Intra-Hour Option and the Scheduling Coordinator may revise the Energy profile up to twenty minutes prior to the applicable Trading Hour. At twenty minutes prior to the applicable Trading Hour, the quantity of the Energy profile must be equal to the lower of: (a) the transmission profile of the E-Tag at forty minutes prior to the applicable Trading Hour; or (b) the quantity of the Economic Hourly Block Bid with Intra-Hour Option. A Scheduling Coordinator is exposed to the Under/Over Delivery Charge if the Energy profile at twenty minutes prior to the applicable Trading Hour is not equal to the

Economic Hourly Block Bid with Intra-Hour Option.

The CAISO may modify the Energy profile due to Reliability related curtailments.

In the case of an intra-hour redispatch from the FMM, the CAISO may increment or decrement the Energy profile to correspond to the intra-hour redispatch. The MW level to which the FMM can redispatch an Economic Hourly Block Bid with Intra-Hour Option above its HASP Advisory Schedule is limited by the quantity of the transmission profile submitted by forty minutes prior to the applicable Trading Hour.

30.5.7.5 FMM Economic Bid

By forty minutes prior to the applicable Trading Hour, the Scheduling Coordinator must submit an E-Tag (or set of E-Tags) that passes CAISO E-Tag validation procedures and that supports the FMM Economic Bid. If the Scheduling Coordinator fails to submit a valid E-Tag by forty minutes prior to the applicable Trading Hour, then the CAISO will set the MW quantity of the FMM Schedule associated with the FMM Economic Bid to zero for each FMM interval of the hour.

The transmission profile of the E-Tag at forty minutes prior to the applicable Trading Hour must be greater than or equal to the FMM Economic Bid. If the Scheduling Coordinator has a transmission profile less than its advisory Energy schedule, then the CAISO will limit the schedule for Energy in the FMM so that it does not exceed the quantity of the transmission profile.

The energy profile of the E-Tag at forty minutes prior to the applicable Trading Hour need not equal the FMM Economic Bid and the Scheduling Coordinator may revise the Energy profile up to twenty minutes prior to the applicable Trading Hour. At twenty minutes prior to the applicable Trading Hour, the quantity of the energy profile must be equal to the lower of: (a) the transmission profile of the E-Tag at forty minutes prior to the applicable Trading Hour; or (b) the quantity of the FMM energy schedule for the first FMM interval of the applicable Trading Hour.

The CAISO may modify the Energy profile due to Reliability related curtailments.

Scheduling Coordinators with cleared FMM Economic Bids may update either the transmission profile or the Energy profile after forty minutes prior to the applicable Trading Hour and twenty minutes prior to the applicable Trading Hour, respectively. A Scheduling Coordinator choosing to update the transmission profile must submit an updated transmission profile at least 40 minutes prior to the applicable FMM interval. A Scheduling Coordinator choosing to update the Energy profile must submit an updated Energy

profile at least 20 minutes prior to the applicable FMM interval.

Cleared FMM Economic Bids are eligible for Bid Cost Recovery as specified in Section 11.8.

Attachment B – Marked Tariff

Compliance Filing

California Independent System Operator Corporation

September 29, 2020

30.5.7 E-Tag Rules and Treatment of Intertie Schedules

In addition to complying with all generally applicable E-Tagging requirements, Scheduling Coordinators must submit their E-Tags consistent with the requirements specified in this Section 30.5.7. If a Scheduling Coordinator receives an intra-hour Schedule change, then the Scheduling Coordinator must, by twenty minutes before the start of the FMM interval to which the Schedule change applies, ensure that an updated energy profile reflects the change. Absent extenuating circumstances, the CAISO automatically updates Energy profiles on E-Tags for Energy Schedules that change from HASP to the FMM within a Trading Hour. In performing this service for a Scheduling Coordinator, the CAISO does not assume any responsibility for compliance with any E-Tag requirements or obligations to which the Scheduling Coordinator is subject. The changed energy profile will apply for the balance of the operating hour unless it is subsequently changed by a further updated energy profile.

30.5.7.1 Self-Schedule Hourly Blocks

By forty minutes prior to the applicable Trading Hour, the Scheduling Coordinator must submit an E-Tag (or set of E-Tags) that passes CAISO E-Tag validation procedures and that supports the Self-Schedule Hourly Block. If the Scheduling Coordinator fails to submit a valid E-Tag by forty minutes prior to the applicable Trading Hour, then the CAISO will set the MW quantity of the FMM Schedule associated with the Self-Schedule Hourly Block to zero for each FMM interval of the hour.

The transmission profile of the E-Tag at forty minutes prior to the applicable Trading Hour must be equal to the Self-Schedule Hourly Block. If the Scheduling Coordinator has a transmission profile less than its advisory Energy schedule, then the CAISO will limit the schedule for Energy in the FMM so that it does not exceed the quantity of the transmission profile.

The energy profile of the E-Tag at forty minutes prior to the applicable Trading Hour need not equal the Self-Schedule Hourly Block and t~~The Scheduling Coordinator may revise the Energy profile up to twenty minutes prior to the applicable Trading Hour. At twenty minutes prior to the applicable Trading Hour, but~~ the quantity of the Energy profile must be equal to the lower of: (a) quantity of the the transmission profile of the E-Tag at forty minutes prior to the applicable Trading Hour; or (b) the Self-Schedule Hourly Block by twenty minutes prior to the applicable Trading Hour. A Scheduling Coordinator is exposed to the Under/Over Delivery Charge if the Energy profile at twenty minutes prior to the applicable Trading Hour is

not equal to the Self-Schedule Hourly Block.

The CAISO may modify the Energy profile due to Reliability related curtailments.

~~If the Scheduling Coordinator fails to submit a valid E-Tag consistent with these deadlines, then the CAISO will set the MW quantity of the FMM Schedule associated with the Self-Schedule Hourly Block to zero for each FMM interval of the hour.~~

30.5.7.2 Variable Energy Resource Self-Schedule

By forty minutes prior to the applicable Trading Hour, the Scheduling Coordinator must submit an E-Tag (or set of E-Tags) that passes CAISO E-Tag validation procedures and that supports the Variable Energy Resource Self-Schedule. If the Scheduling Coordinator fails to submit a valid E-Tag by forty minutes prior to the applicable Trading Hour, then the CAISO will set the MW quantity of the FMM Schedule associated with the Variable Energy Resource Self-Schedule to zero for each FMM interval of the hour.

The transmission profile of the E-Tag at forty minutes prior to the applicable Trading Hour must be equal to the Variable Energy Resource Self-Schedule. If the Scheduling Coordinator has a transmission profile less than its advisory Energy schedule, then the CAISO will limit the schedule for Energy in the FMM so that it does not exceed the quantity of the transmission profile.

The energy profile of the E-Tag at forty minutes prior to the applicable Trading Hour need not equal the Variable Energy Resource Self-Schedule and tThe Scheduling Coordinator may revise the Energy profile up to twenty minutes prior to the applicable Trading Hour. At twenty minutes prior to the applicable Trading Hour, but the quantity of the Energy profile must be equal to the lower of: (a) the transmission profile of the E-Tag at forty minutes prior to the applicable Trading Hour; or (b) the quantity of the Variable Energy Resource Self-Schedule. by twenty minutes prior to the applicable Trading Hour. The CAISO may modify the Energy profile due to Reliability related curtailments. A Scheduling Coordinator is exposed to the Under/Over Delivery Charge if the Energy profile at twenty minutes prior to the applicable Trading Hour is not equal to the Variable Energy Resource Self-Schedule.

The CAISO may modify the Energy profile due to Reliability related curtailments.

~~If the Scheduling Coordinator fails to submit a valid E-Tag consistent with these deadlines, then the CAISO will set the MW quantity of the FMM Schedule associated with the Variable Energy Resource Self-Schedule to zero for each FMM interval of the hour.~~

30.5.7.3 Economic Hourly Block Bid

By forty minutes prior to the applicable Trading Hour, the Scheduling Coordinator must submit an E-Tag (or set of E-Tags) that passes CAISO E-Tag validation procedures and that supports the Economic Hourly Block Bid. If the Scheduling Coordinator fails to submit a valid E-Tag by forty minutes prior to the applicable Trading Hour, then the CAISO will set the MW quantity of the FMM Schedule associated with the Economic Hourly Block Bid to zero for each FMM interval of the hour.

The transmission profile of the E-Tag at forty minutes prior to the applicable Trading Hour must be equal to the Economic Hourly Block Bid. If the Scheduling Coordinator has a transmission profile less than its advisory Energy schedule, then the CAISO will limit the schedule for Energy in the FMM so that it does not exceed the quantity of the transmission profile.

The energy profile of the E-Tag at forty minutes prior to the applicable Trading Hour need not equal the Economic Hourly Block Bid and tThe Scheduling Coordinator may revise the Energy profile up to twenty minutes prior to the applicable Trading Hour. At twenty minutes prior to the applicable Trading Hour, but the quantity of the Energy profile must be equal to the lower of: (a) the transmission profile of the E-Tag at forty minutes prior to the applicable Trading Hour; or (b) to the quantity of the Economic Hourly Block Bid by twenty minutes prior to the applicable Trading Hour. A Scheduling Coordinator is exposed to the Under/Over Delivery Charge if the Energy profile at twenty minutes prior to the applicable Trading Hour is not equal to the Economic Hourly Block Bid.

The CAISO may modify the Energy profile due to Reliability related curtailments.

~~If the Scheduling Coordinator fails to submit a valid E-Tag consistent with these deadlines, then the CAISO will set the MW quantity of the FMM Schedule associated with the Economic Hourly Block Bid to zero for each FMM interval of the hour.~~

30.5.7.4 Economic Hourly Block Bid with Intra-Hour Option

By forty minutes prior to the applicable Trading Hour, the Scheduling Coordinator must submit an E-Tag (or set of E-Tags) that passes CAISO E-Tag validation procedures and that supports the Economic Hourly Block Bid with Intra-Hour Option. If the Scheduling Coordinator fails to submit a valid E-Tag by forty minutes prior to the applicable Trading Hour, then the CAISO will set the MW quantity of the FMM Schedule associated with the Economic Hourly Block Bid with Intra-Hour Option to zero for each FMM

interval of the hour.

The transmission profile of the E-Tag at forty minutes prior to the applicable Trading Hour must be equal to the Economic Hourly Block Bid with Intra-Hour Option. If the Scheduling Coordinator has a transmission profile less than its advisory Energy schedule, then the CAISO will limit the schedule for Energy in the FMM so that it does not exceed the quantity of the transmission profile.

The energy profile of the E-Tag at forty minutes prior to the applicable Trading Hour need not equal the Economic Hourly Block Bid with Intra-Hour Option and tThe Scheduling Coordinator may revise the Energy profile up to twenty minutes prior to the applicable Trading Hour. At twenty minutes prior to the applicable Trading Hour, ~~but~~ the quantity of the Energy profile must be equal to the lower of: (a) the transmission profile of the E-Tag at forty minutes prior to the applicable Trading Hour; or (b) the quantity of the Economic Hourly Block Bid with Intra-Hour Option. A Scheduling Coordinator is exposed to the Under/Over Delivery Charge if the Energy profile at twenty minutes prior to the applicable Trading Hour is not equal to the Economic Hourly Block Bid with Intra-Hour Option.

~~by twenty minutes prior to the applicable Trading Hour.~~The CAISO may modify the Energy profile due to Reliability related curtailments.

~~If the Scheduling Coordinator fails to submit a valid E-Tag consistent with these deadlines, then the CAISO will set the MW quantity of the FMM Schedule associated with the Economic Hourly Block Bid with Intra-Hour Option to zero for each FMM interval of the hour.~~

In the case of an intra-hour redispatch from the FMM, the CAISO may increment or decrement the Energy profile to correspond to the intra-hour redispatch. The MW level to which the FMM can redispatch an Economic Hourly Block Bid with Intra-Hour Option above its HASP Advisory Schedule is limited by the quantity of the transmission profile submitted by forty minutes prior to the applicable Trading Hour.

30.5.7.5 FMM Economic Bid

By forty minutes prior to the applicable Trading Hour, the Scheduling Coordinator must submit an E-Tag (or set of E-Tags) that passes CAISO E-Tag validation procedures and that supports the FMM Economic Bid. If the Scheduling Coordinator fails to submit a valid E-Tag by forty minutes prior to the applicable Trading Hour, then the CAISO will set the MW quantity of the FMM Schedule associated with the FMM Economic Bid to zero for each FMM interval of the hour.

The transmission profile of the E-Tag at forty minutes prior to the applicable Trading Hour must be greater than or equal to the FMM Economic Bid. If the Scheduling Coordinator has a transmission profile less than its advisory Energy schedule, then the CAISO will limit the schedule for Energy in the FMM so that it does not exceed the quantity of the transmission profile.

~~The energy profile of the E-Tag at forty minutes prior to the applicable Trading Hour need not equal the FMM Economic Bid and t~~The Scheduling Coordinator may revise the Energy profile up to twenty minutes prior to the applicable Trading Hour. At twenty minutes prior to the applicable Trading Hour, the quantity of the energy profile must be equal to the lower of: (a) the transmission profile of the E-Tag at forty minutes prior to the applicable Trading Hour; or (b) but the quantity of the Energy profile must be equal to the quantity of the FMM energy schedule for the first FMM interval of the applicable Trading Hour by twenty minutes prior to the applicable Trading Hour.

The CAISO may modify the Energy profile due to Reliability related curtailments.

~~If the Scheduling Coordinator fails to submit a valid E-Tag consistent with these deadlines, then the CAISO will set the MW quantity of the FMM Schedule associated with the FMM Economic Bid to zero for each FMM interval of the hour.~~

Scheduling Coordinators with cleared FMM Economic Bids may update either the transmission profile or the Energy profile after forty minutes prior to the applicable Trading Hour and twenty minutes prior to the applicable Trading Hour, respectively~~the relevant deadlines~~. A Scheduling Coordinator choosing to update the transmission profile must submit an updated transmission profile at least 40 minutes prior to the applicable FMM interval. A Scheduling Coordinator choosing to update the Energy profile must submit an updated Energy profile at least 20 minutes prior to the applicable FMM interval.

Cleared FMM Economic Bids are eligible for Bid Cost Recovery as specified in Section 11.8.