The California Independent System Operator Corporation (CAISO) respectfully requests a temporary suspension of the effectiveness, or limited waiver, of the tariff revisions accepted in the order issued in this proceeding on September 17, 2020.1 The provisions governed by the September 17 Order have an October 1, 2020, effective date. Due to implementation issues identified after the CAISO’s initial May 22, 2020, filing in this proceeding, the CAISO cannot enact the provisions on October 1, 2020. The CAISO requests a temporary suspension of the effectiveness, or limited waiver, of the tariff revisions accepted in the September 17 Order until January 1, 2021.

I. Background

On May 22, 2020, the CAISO filed tariff amendments in this proceeding to enhance its market rules regarding the treatment of energy transactions

---

scheduled at interties. The September 17 Order accepted the filed amendments with the requested October 1, 2020, effective date, subject to a compliance filing.

After submitting its May 22 filing, the CAISO determined that the planned October 1 implementation was no longer feasible. Specifically, the CAISO experienced delays in integrating the needed changes to the CAISO’s systems and those of the vendor that administers the E-tagging processes. Those issues were not resolved in time for the CAISO and its market participants to complete the scheduled market simulation activities. Rather than rushing to production, the CAISO determined that deferring implementation was a more prudent approach. The CAISO informed its stakeholders of this decision on its July 14 Release User Group meeting. At that point, the CAISO anticipated a January 1, 2021, implementation date.

II. Petition for Waiver

Good cause exists for the Commission to grant a limited waiver to suspend the effectiveness until January 1, 2021, of the tariff revisions accepted in the September 17 Order. The Commission previously has granted requests


\[\text{3 The tariff changes ordered are being submitted in a separate contemporaneous compliance filing. The tariff amendments submitted on compliance have an effective date of January 1, 2021, to be consistent with the change in effective date requested through this waiver.}\]

for tariff waivers where: (1) the applicant acted in good faith; (2) the waiver was of limited scope; (3) the waiver addressed a concrete problem; and (4) the waiver did not have undesirable consequences, such as harming third parties. This waiver petition meets all four conditions.

The CAISO has acted in good faith because it notified its affected stakeholders once it knew that the October 1 date was no longer feasible. The CAISO promptly filed this request upon making that determination. The CAISO did not file with the Commission at that point because it was not yet certain if the new planned implementation date of January 1 would slip further. The waiver is of limited scope in that it will apply only for three months. The waiver will also remedy the concrete problem that the CAISO cannot implement the tariff revisions on October 1 without risking implementation of potentially flawed systems. The Commission has recognized that it is reasonable to postpone the effectiveness of tariff revisions where, as in this proceeding, it is infeasible to implement the tariff revisions on their intended effective date because the CAISO cannot deploy the necessary software until a later date. Further, the waiver will not have undesirable consequences because the CAISO can continue to operate using its existing intertie scheduling practices in the interim.

---


Therefore, good cause exists to grant the CAISO’s request for limited waiver of the current effective date of October 1, 2020, for the tariff revisions covered by this request.

III. Conclusion

The Commission should find that good cause exists to grant this request for limited waiver to permit a delay in implementing the tariff provisions approved in the September 17 Order.

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

Dated:  September 29, 2020
CERTIFICATE OF SERVICE

I certify that I have served the foregoing document upon the parties listed on
the official service list in the captioned 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 29th day of September, 2020.

/s/ Jacqueline Meredith
Jacqueline Meredith