

September 6, 2019

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. ER19-1837-001**

Dear Secretary Bose:

## **I. Overview of Compliance Filing**

The California Independent System Operator Corporation (“CAISO”) submits this filing in compliance with the Federal Energy Regulatory Commission’s August 9, 2019 order in this proceeding.<sup>1</sup> In its August 9, 2019 order, the Commission accepted the CAISO’s May 14, 2019 filing, made pursuant to Section 205 of the Federal Power Act. In that filing, the CAISO proposed tariff revisions to add additional detail to clarify the meaning of various provisions, ensure consistency throughout the tariff as well as between the tariff and applicable business practices, and correct typographical and other inadvertent errors. The Commission’s acceptance of the CAISO’s proposed tariff revisions was contingent upon the CAISO submitting revised tariff language in section 40.9.6.2(d) relating to the distribution of charges under the CAISO’s resource adequacy availability incentive mechanism that are not distributed to eligible resource adequacy resources. In its initial filing, the CAISO inadvertently changed language in section 40.9.6.2(d) that would have modified the allocation methodologies for the distribution of these funds to load serving entities. In this compliance in filing, the CAISO proposes to revise section 40.9.6.2(d) to maintain its existing allocation methodologies.

## **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; and

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<sup>1</sup> *California Independent System Operator Corp.*, 168 FERC ¶ 61,084 (2019).

Attachment B      Red-lined document showing the revisions contained in this tariff amendment.

### III. Conclusion

The CAISO respectfully requests that the Commission approve the tariff modifications in contained this filing as fully complying with the August 9, 2019 order in this proceeding Order. Please contact the undersigned if there are any questions regarding this filing.

Respectfully submitted,

/s/ Andrew Ulmer  
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General Counsel  
Anthony Ivancovich  
Deputy General Counsel  
Andrew Ulmer  
Director, Federal Regulatory Affairs  
The California Independent System  
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**Attachment A – Clean Tariff**

**Filing to Comply with August 9, 2019 Order in Docket No. ER19-1837**

**California Independent System Operator Corporation**

#### 40.9.6.2 Determination of Availability Incentive Payment

\* \* \* \* \*

- (d) **Unpaid Funds.** Any Non-Availability Charge funds that are not distributed to Resource Adequacy Resources eligible to receive Availability Incentive Payments in a month will be added to the funds available for Availability Incentive Payments in the next month and will continue to roll over to successive months until the end of the year. The CAISO distributes any unallocated funds remaining after the CAISO settles December monthly RAAIM Non-Availability Charges and Non-Availability Incentive Payments. The separate pool of undistributed Non-Availability Charge funds collected for local and/or system Resource Adequacy Capacity will be distributed to Load Serving Entities based on their load ratio share for the year. The separate pool of undistributed Non-Availability Charge funds collected for Flexible RA Capacity will be distributed to Load Serving Entities based on their overall ratio of obligation to demonstrate Flexible RA Capacity for the year.

**Attachment B – Marked Tariff**

**Filing to Comply with August 9, 2019 Order in Docket No. ER19-1837**

**California Independent System Operator Corporation**

#### 40.9.6.2 Determination of Availability Incentive Payment

\* \* \* \* \*

- (d) **Unpaid Funds.** Any Non-Availability Charge funds that are not distributed to Resource Adequacy Resources eligible to receive Availability Incentive Payments in a month will be added to the funds available for Availability Incentive Payments in the next month and will continue to roll over to ~~the successive months~~ until the end of the year. The CAISO distributes any unallocated funds remaining after the CAISO settles December monthly RAAIM Non-Availability Charges and Non-Availability Incentive Payments. paid out or December 31, at which time tThe separate pool of undistributed Non-Availability Charge funds collected for local and/or system Resource Adequacy Capacity will be distributed to Load Serving Entities based on their load ratio share for the year. The separate pool of undistributed Non-Availability Charge funds collected for Flexible RA Capacity will be distributed to Load Serving Entities based on their overall ratio of obligation to demonstrate Flexible RA Capacity for the year.

## 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 Washington D.C., this 6th day of September, 2019.

*/s/ Daniel Klein*  
Daniel Klein