

September 9, 2019

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

**Re: California Independent System Operator Corporation,
Docket No. ER06-615-____
Informational Filing per CAISO Tariff Section 39.7.1.3.2
Request for Privileged Treatment Under 18 C.F.R Section 388.112**

Dear Secretary Bose:

Pursuant to Section 39.7.1.3.2 of its tariff, the California Independent System Operator Corporation (CAISO) submits this informational filing containing the rates or formulas used to calculate negotiated default energy bids, custom operations and maintenance adders, major maintenance adders, and opportunity costs for the month of August, 2019. In these reports, the CAISO includes information on new, modified, or terminated rates and formulas that were implemented in the preceding month. In August 2019, there was one revised major maintenance adder (Attachment A); and one new custom operations and maintenance adder (Attachment B). There were no new, revised, or terminated negotiated default energy bids or calculated opportunity costs in August 2019.

Section 20.2 of the CAISO tariff requires that the CAISO treat individual bids from scheduling coordinators as confidential. Negotiated default energy bids and start-up and minimum load costs, which include custom operations and maintenance adders, and major maintenance adders, are components of bids. Accordingly, pursuant to section 20.2 of the CAISO tariff, the CAISO has labeled the documents included with this filing as confidential. In addition, the documents contain proprietary information regarding specific generating units, such as unit efficiency factors, scaling factors, and operation and maintenance costs. For these reasons, the Commission should accord these attachments privileged treatment pursuant to Section 388.112 of the Commission's regulations.

Please contact the undersigned if you have any questions or concerns regarding the foregoing.

Respectfully submitted,

By: /s/ Sidney Mannheim

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Informational Filing Pursuant to CAISO Tariff Section 39.7.1.3.2

September 9, 2019

California Independent System Operator Corporation

Attachment A

Confidential Major Maintenance Adder Information

**[ATTACHMENT CONSISTS OF PRIVILEGED MATERIAL REDACTED
PURSUANT TO 18 C.F.R. § 388.112]**

Informational Filing Pursuant to CAISO Tariff Section 39.7.1.3.2

September 9, 2019

California Independent System Operator Corporation

Attachment B

Confidential Custom Operation and Maintenance Adder Information

**[ATTACHMENT CONSISTS OF PRIVILEGED MATERIAL REDACTED
PURSUANT TO 18 C.F.R. § 388.112]**

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed 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 Folsom, California, this 9th day of September, 2019.

/s/ Anna Pascuzzo
Anna Pascuzzo