

September 15, 1999

The Honorable David P. Boergers  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

**Re: California Independent System Operator Corporation  
Docket No. ER99-3289-\_\_\_\_\_**

Dear Secretary Boergers:

Enclosed for filing please find copies of tariff sheets for the California Independent System Operator Corporation ("ISO") FERC Electric Tariff submitted in compliance with the Commission's August 16, 1999 Order in the above-captioned docket.

On June 17, 1999, the ISO filed Amendment No. 17 to the ISO Tariff in the above-captioned docket. Amendment No. 17 proposed a variety of modifications to the ISO Tariff, including the following: a) changes related to the *pro forma* Participating Load Agreement submitted with the amendment; b) changes to clarify the Outage Coordination Protocol in several respects; c) changes to expand the options available to Scheduling Coordinators to satisfy financial criteria established by the ISO Tariff; d) changes to the Grid Management Charge formula to remove a telecommunications charge; e) changes to the ISO Tariff and the Grid Management Charge formula to add recovery mechanisms for Western Systems Coordinating Council ("WSCC") fines; f) changes to the allocation of the Regulation Energy Payment Adjustment ("REPA"); g) changes to the ISO Payment Calendar; and h) changes to the Dispatch Protocol to conform a provision of the protocol to the ISO's actual practices.

Numerous parties submitted motions to intervene, comments and/or protests to Amendment No. 17. On July 22, 1999, the ISO submitted its Answer to Motions to Intervene, Motion for Conditional Acceptance, Request for Clarification, Comments and Protests in the above-captioned docket. In its Answer, the ISO agreed to make a number of small revisions to the ISO Tariff in response to various intervenor comments and questions on Amendment No. 17. The ISO also agreed to make one revision to the *pro forma* Participating Load Agreement.

On August 16, 1999, the Commission issued an order accepting Amendment No. 17 with certain modifications to be submitted in a compliance filing within 30 days. *California Independent System Operator Corp.*, 88 FERC ¶ 61,182 (1999). The modifications ordered by the Commission were consistent with the revisions the ISO had committed to make in its Answer. Specifically, the Commission accepted the ISO's commitment to modify the Tariff changes related to the recovery of WSCC fines in order to: 1) provide additional guidance on what actions or inactions could subject a Market Participant to assignment of such fines, and 2) to provide assurances that the ISO will only collect through the GMC those WSCC fines that it cannot directly assign to a Scheduling Coordinator. 88 FERC ¶ 61,182, slip op. at 6. The Commission also accepted the ISO's proposal to make a conforming change to a provision of the ISO Tariff which would be consistent with the Tariff changes related to REPA allocation *Id.*, slip op. at 7-8. The ISO had also committed to revise the *pro forma* Participating Load Agreement by deleting a provision of the agreement which cross-references the ISO's existing authority, under Section 2.3.2.8.2 of the ISO Tariff, to require direct control over Curtailable Demand for managing System Emergencies. See the ISO's July 22 Answer at 9-11.

Enclosed are revised ISO Tariff sheets which incorporate the Tariff revisions ordered by the Commission (Attachment A) as well as the black-lined text of the affected Tariff provisions identifying the changes made in this compliance filing (Attachment B). Also enclosed are a revised page of the *pro forma* Participating Load Agreement (Attachment C) and a version of this page with the revisions identified in black-lined text (Attachment D). In addition, the ISO encloses a notice of filing suitable for publication in the Federal Register (Attachment E) and a 3½ inch diskette containing the notice in WordPerfect format.

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Two extra copies of the filing are enclosed. Please date-stamp the extra copies with the time and date of filing and return it to the messenger. Thank you for your assistance in this matter.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I hereby certify that I have served the foregoing document upon all parties on the official service list compiled by the Secretary in the above-captioned 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 Washington, D.C. this 15<sup>th</sup> day of September, 1999.

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Sean A. Atkins