

April 6, 2022

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

**Re: California Independent System Operator Corporation
Filing to Comply with Order No. 676-I
Docket Nos. ER21-2495-000; ER21-2496-001**

Dear Secretary Bose:

The California Independent System Operator Corporation (“CAISO”)¹ submits this filing in compliance with the Commission’s Order on Compliance and Request for Waivers², issued March 7, 2022. In Order No. 676-I³, the Commission directed public utilities, including the CAISO, to incorporate into their jurisdictional tariffs the latest versions of the business practice standards promulgated by the Wholesale Electric Quadrant (“WEQ”) of the North American Energy Standards Board (“NAESB”) and included by reference in the Commission’s regulations.

¹ Capitalized terms not otherwise defined herein have the meanings set forth in appendix A to the CAISO tariff.

² *Order on Request for Waivers*, Docket Nos. ER21-2495-000 and ER21-2496-001 (March 7, 2022), 178 FERC ¶ 61,158 (“Waiver Order”).

³ *Standards for Bus. Practices & Comm’n Protocols for Pub. Utils.*, Order No. 676-I, 85 FR 10,571 (Feb. 25, 2020), 170 FERC ¶ 61,062 (2020).

The CAISO filed for waiver of certain of these standards, which the Commission granted in its Waiver Order. As part of that order, the Commission directed the CAISO to make a compliance filing, within 30 days of the date of the order, to revise section 7.3.3 of its tariff to indicate those Business Practice Standards for which the Commission has granted waiver, and for each of those Business Practice Standards granted waiver, to include a citation to the order granting the request for waivers.⁴

The CAISO accordingly requests that the Commission accept the enclosed tariff revisions in compliance with the Commission's Waiver Order, effective May 1, 2022.

I. Background

In Order No. 676-I, the Commission amended its regulations to incorporate by reference the latest version (Version 003.2) of specified business practice standards that NAESB filed with the Commission on December 8, 2017 and including minor clarifications and updates submitted by NAESB on June 5, 2019 and July 23, 2019. The Version 003.2 NAESB standards include updates to standards that the Commission previously incorporated by reference into its regulations. The Version 003.2 standards build upon the standards included in the WEQ Version 003.1 Standards and include, in their entirety, the modifications submitted to the Commission in WEQ Version 003.1, which were the subject of

⁴ 178 FERC ¶ 61,158 at P 15.

an earlier notice of proposed rulemaking.⁵

The Version 003.2 standards also include updates to NAESB's Smart Grid Standards (WEQ-018 and WEQ-019) that the Commission listed for informational purposes in Part 2 of the Commission's Regulations, to match the latest iteration of those standards.⁶ Finally, the Commission incorporated by reference the WEQ-022 Electric Industry Registry (EIR) Business Practice Standards, but declined to incorporate by reference in its entirety the WEQ-023 Modeling Business Practice Standards.⁷

Order No. 676-I directed public utilities to revise their Open Access Transmission Tariffs ("OATTs") to incorporate certain NAESB standards by reference.⁸

The Commission initially directed public utilities to submit their Order No. 676-I compliance filings by May 25, 2020, and to make the tariff revisions in those filings using an indeterminate effective date (12/31/9998) for the tariff records.⁹ However, in response to a motion for extension of time, the

⁵ Order No. 676-I, 170 FERC ¶ 61,062, at PP 2.

⁶ *Id.* at PP 4.

⁷ *Id.* at PP 5.

⁸ *Id.* The Commission also incorporated those NAESB standards into its regulations by reference in 18 CFR 38.1.

⁹ *Id.* at PP 20, 65.

Commission extended the date for compliance and waiver filings to July 27, 2021.¹⁰

In addition, on March 3, 2020, the Commission issued a notice explaining that in publishing the final rule, the Federal Register made various formatting and editorial changes to the text of the regulations, 18 C.F.R. §§ 2.27 and 38.1 (2021), where the Commission incorporates by reference NAESB's WEQ Business Practice Standards.¹¹ The Commission stated that the regulatory text included with the Commission's Order No. 676-I, as issued by the Commission, would be revised by the March 3, 2020 notice to reflect the regulatory text as published in the Federal Register.¹²

On July 23, 2021, as amended on October 21, 2021, the CAISO submitted its compliance filing¹³ and a request for waivers¹⁴ in response to the compliance

¹⁰ *Standards for Bus. Pracs. & Commc'n Protocols for Pub. Utils.*, Notice of Extension of Time, Docket No. RM05-5-028 (Apr. 3, 2020). The Notice stated that the Commission would not establish an implementation date earlier than October 27, 2021.

¹¹ *Standards for Bus. Pracs. & Commc'n Protocols for Pub. Utils.*, Errata Notice, Docket No. RM05-5-025, et al. (Mar. 3, 2020).

¹² An additional notice was issued on July 20, 2021, to correct the filing code to be used to submit tariff sheets in compliance with Order No. 676-I as Type of Filing Code 80. *Standards for Bus. Pracs. & Commc'n Protocols for Pub. Utils.*, Errata Notice, Docket No. RM05-5-025, et al. (July 20, 2021).

¹³ *Calif. Indep. Sys. Operator Corp.*, Docket No. ER21-2496-000, July 23, 2021 Compliance Filing (Compliance Filing) and *Calif. Indep. Sys. Operator Corp.*, Docket No. ER21-2496-001, October 21, 2021 Amendment Filing (Amended Compliance Filing).

¹⁴ *Calif. Indep. Sys. Operator Corp.*, July 23, 2021 Waiver Request (Waiver Request), Docket No. ER21-2495-000.

requirements of Order No. 676-I. The Commission accepted this filing in its Waiver Order on March 7, 2022.¹⁵

The Waiver Order also granted the CAISO's requests for waiver. Specifically, the Commission granted the CAISO's requests for continued waiver of WEQ-002, WEQ-003, and WEQ-013, as well as a renewed partial waiver of WEQ-001 and WEQ-012.¹⁶ The Commission also granted CAISO's request for waiver of the newly adopted Version 003.2 Business Practice Standards requirements related to Open Access Same-Time Information System (OASIS) that are based on the transmission service model embodied in the *pro forma* OATT.¹⁷ Finally, the Commission granted CAISO's request for waiver of the newly adopted Version 003.2 Business Practice Standards in WEQ-006-5 and WEQ-006-9 pertaining to the time monitoring and time error notification, respectively.¹⁸

With respect to the granted waiver of the standards cited above, the Commission directed the CAISO to make a compliance filing, within 30 days of the date of the Order, to revise section 7.3.3 of its tariff to indicate those standards for which the Commission has granted waiver, and for each of those

¹⁵ Waiver Order at PP 14.

¹⁶ *Id.*

¹⁷ *Id.*

¹⁸ *Id.*

standards granted waiver, to include a cite to the order granting the waiver requests.¹⁹

II. Proposed Tariff Revisions

Adoption of the NAESB standards set forth in Order No. 676-I does not require any substantive changes or revisions to the existing provisions of the CAISO tariff. Therefore, in accordance with Order No. 676-I, the CAISO previously revised section 7.3.3 of its tariff to incorporate those NAESB standards by reference.

Now, the CAISO has revised tariff section 7.3.3 further to list the Version 003.2 NAESB standards for which the CAISO has been granted a waiver, and citing the Commission's Waiver Order, issued March 7, 2022.

III. Contents of this Filing

In addition to this transmittal letter, this filing includes the following attachments:

- | | |
|--------------|--|
| Attachment A | Clean CAISO tariff sheets incorporating the compliance changes described above |
| Attachment B | Red-lined CAISO Tariff sheets incorporating the compliance changes described above |

¹⁹ *Id.* at PP 15.

IV. Conclusion

For the reasons set forth in this filing, the CAISO respectfully requests that the Commission accept the tariff revisions contained in the filing as compliant with Waiver Order, effective as of May 1, 2022.

Respectfully submitted,

John E. Spomer
Senior Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630
Tel: (916) 351-4400
Fax: (916) 608-7236
E-mail: jspomer@caiso.com

Sean A. Atkins
Bradley R. Miliauskas
Davis Wright Tremaine, LLP
1301 K Street NW
Suite 500 East
Washington, D.C. 20005
Tel: (202) 973-4200
Fax: (202) 973-4499
E-mail: seanatkins@dwt.com
bradleymiliauskas@dwt.com

Counsel for the California Independent System Operator Corporation

ATTACHMENT A

7.3.3 NAESB Standards

The following standards of the Wholesale Electric Quadrant (WEQ) of the North American Energy Standards Board (NAESB) are incorporated by reference, except to the extent FERC has granted waiver of such NAESB WEQ standards:

- WEQ-000, Abbreviations, Acronyms, and Definition of Terms, WEQ Version 003.1, September 30, 2015 (including only the definitions of Interconnection Time Monitor, Time Error, and Time Error Correction);
- WEQ-000, Abbreviations, Acronyms, and Definition of Terms (WEQ Version 003.2, Dec. 8, 2017) (with minor correction applied July 23, 2019);
- WEQ-001, Open Access Same-Time Information Systems (OASIS), [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017), excluding standards WEQ-001-9 preamble text, WEQ-001-10 preamble text, and exclusively as to standards WEQ-001-13.1.1, 001-13.1.4, 001-13.1.5, and 001-16;
- WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocols (S&CP), [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-003, Open Access Same-Time Information Systems (OASIS) Data Dictionary, [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017) (with minor corrections applied July 23, 2019);
- WEQ-004, Coordinate Interchange (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-005, Area Control Error (ACE) Equation Special Cases (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-006, Manual Time Error Correction (WEQ Version 003.1, Sept. 30, 2015);
- WEQ-007, Inadvertent Interchange Payback (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-008, Transmission Loading Relief (TLR)—Eastern Interconnection (WEQ Version 003.2, Dec. 8, 2017);

- WEQ-011, Gas/ Electric Coordination (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-012, Public Key Infrastructure (PKI) (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-013, Open Access Same-Time Information Systems (OASIS) Implementation Guide, [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-021, Measurement and Verification of Energy Efficiency Products (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-022, Electric Industry Registry Business Practice Standards (WEQ Version 003.2, Dec. 8, 2017); and
- WEQ-023, Modeling. The following standards are incorporated by reference: WEQ-023-5; WEQ-023-5.1; WEQ-023-5.1.1; WEQ-023-5.1.2; WEQ-023-5.1.2.1; WEQ-023-5.1.2.2; WEQ-023-5.1.2.3; WEQ-023-5.1.3; WEQ-023-5.2; WEQ-023-6; WEQ-023-6.1; WEQ-023-6.1.1; WEQ-023-6.1.2; and WEQ-023-A Appendix A. (WEQ Version 003.2, Dec. 8, 2017).

Pursuant to FERC's Order on Compliance and Request for Waivers, Docket Nos. ER21-2495-000 and ER21-2496-001 (March 7, 2022), the CAISO has been granted a waiver of the following NAESB WEQ standards:

- WEQ-001, Open Access Same-Time Information Systems (OASIS), [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017), excluding standards WEQ-001-9 preamble text, WEQ-001-10 preamble text, and except as set forth above;
- WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocols (S&CP), [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-003, Open Access Same-Time Information Systems (OASIS) Data Dictionary, [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017) (with minor corrections applied July 23, 2019);
- WEQ-006, Manual Time Error Correction (WEQ Version 003.1, Sept. 30, 2015) and only as to standards WEQ-006-5 and 006-9;

- WEQ-012, Public Key Infrastructure (PKI) (WEQ Version 003.2, Dec. 8, 2017) to the extent it applies to OASIS applications;
- WEQ-013, Open Access Same-Time Information Systems (OASIS) Implementation Guide, [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017); and
- WEQ-023, Modeling; specifically, standards WEQ-023-5; WEQ-023-5.1; WEQ-023-5.1.1; WEQ-023-5.1.2; WEQ-023-5.1.2.1; WEQ-023-5.1.2.2; WEQ-023-5.1.2.3; WEQ-023-5.1.3; WEQ-023-5.2; WEQ-023-6; WEQ-023-6.1; WEQ-023-6.1.1; WEQ-023-6.1.2; and WEQ-023-A Appendix A. (WEQ Version 003.2, Dec. 8, 2017).

ATTACHMENT B

7.3.3 NAESB Standards

The following standards of the Wholesale Electric Quadrant (WEQ) of the North American Energy Standards Board (NAESB) are incorporated by reference, except to the extent FERC has granted waiver of such NAESB WEQ standards:

- WEQ-000, Abbreviations, Acronyms, and Definition of Terms, WEQ Version 003.1, September 30, 2015 (including only the definitions of Interconnection Time Monitor, Time Error, and Time Error Correction);
- WEQ-000, Abbreviations, Acronyms, and Definition of Terms (WEQ Version 003.2, Dec. 8, 2017) (with minor correction applied July 23, 2019);
- WEQ-001, Open Access Same-Time Information Systems (OASIS), [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017), excluding standards WEQ-001-9 preamble text, WEQ-001-10 preamble text, and exclusively as to standards WEQ-001-13.1.1, 001-13.1.4, 001-13.1.5, and 001-16;
- WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocols (S&CP), [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-003, Open Access Same-Time Information Systems (OASIS) Data Dictionary, [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017) (with minor corrections applied July 23, 2019);
- WEQ-004, Coordinate Interchange (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-005, Area Control Error (ACE) Equation Special Cases (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-006, Manual Time Error Correction (WEQ Version 003.1, Sept. 30, 2015);
- WEQ-007, Inadvertent Interchange Payback (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-008, Transmission Loading Relief (TLR)—Eastern Interconnection (WEQ Version 003.2, Dec. 8, 2017);

- WEQ-011, Gas/ Electric Coordination (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-012, Public Key Infrastructure (PKI) (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-013, Open Access Same-Time Information Systems (OASIS) Implementation Guide, [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-021, Measurement and Verification of Energy Efficiency Products (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-022, Electric Industry Registry Business Practice Standards (WEQ Version 003.2, Dec. 8, 2017); and
- WEQ-023, Modeling. The following standards are incorporated by reference: WEQ-023-5; WEQ-023-5.1; WEQ-023-5.1.1; WEQ-023-5.1.2; WEQ-023-5.1.2.1; WEQ-023-5.1.2.2; WEQ-023-5.1.2.3; WEQ-023-5.1.3; WEQ-023-5.2; WEQ-023-6; WEQ-023-6.1; WEQ-023-6.1.1; WEQ-023-6.1.2; and WEQ-023-A Appendix A. (WEQ Version 003.2, Dec. 8, 2017).

Pursuant to FERC's Order on Compliance and Request for Waivers, Docket Nos. ER21-2495-000 and ER21-2496-001 (March 7, 2022), the CAISO has ~~applied for~~been granted a waiver of the following

NAESB WEQ standards:

- WEQ-001, Open Access Same-Time Information Systems (OASIS), [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017), excluding standards WEQ-001-9 preamble text, WEQ-001-10 preamble text, and except as set forth above;
- WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocols (S&CP), [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017);
- WEQ-003, Open Access Same-Time Information Systems (OASIS) Data Dictionary, [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017) (with minor corrections applied July 23, 2019);
- WEQ-006, Manual Time Error Correction (WEQ Version 003.1, Sept. 30, 2015) and only as to standards WEQ-006-5 and 006-9;

- WEQ-012, Public Key Infrastructure (PKI) (WEQ Version 003.2, Dec. 8, 2017) to the extent it applies to OASIS applications;
- WEQ-013, Open Access Same-Time Information Systems (OASIS) Implementation Guide, [OASIS] Version 2.2 (WEQ Version 003.2, Dec. 8, 2017); and
- WEQ-023, Modeling; specifically, standards WEQ-023-5; WEQ-023-5.1; WEQ-023-5.1.1; WEQ-023-5.1.2; WEQ-023-5.1.2.1; WEQ-023-5.1.2.2; WEQ-023-5.1.2.3; WEQ-023-5.1.3; WEQ-023-5.2; WEQ-023-6; WEQ-023-6.1; WEQ-023-6.1.1; WEQ-023-6.1.2; and WEQ-023-A Appendix A. (WEQ Version 003.2, Dec. 8, 2017).

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 6th day of April, 2022.

/s/ Jacqueline Meredith

Jacqueline Meredith
An employee of the California ISO