

December 15, 2014

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

Re: California Independent System Operator Corporation Docket Nos. ER06-615-\_\_\_ and ER07-1257-\_\_\_ Market Disruption Report

Dear Secretary Bose:

The California Independent System Operator Corporation (ISO) hereby submits its October/November report covering Market Disruption reportable events under Section 7.7.15 of its FERC Electric Tariff (ISO Tariff) that occurred from October 16, 2014 to November 15, 2014.<sup>1</sup>

Please contact the undersigned with any questions.

Respectfully submitted,

#### By: /s/ Anna A. McKenna

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The ISO submits the Market Disruption report pursuant to *California Independent System Operator Corp.*, 126 FERC ¶ 61,211 (2009), and Section 7.7.15.4 of the ISO Tariff.



## Market Disruption Report October 16, 2014 to November 15, 2014

December 15, 2014

ISO Market Quality and Renewable Integration

#### I. Background

A Market Disruption is an action or event that causes a failure of a CAISO Market, related to system operation issues or System Emergencies.<sup>1</sup> Pursuant to Section 7.7.15 of the ISO Tariff, the California Independent System Operator Corporation (ISO or CAISO) can take one or more of a number of specified actions in the event of a Market Disruption, to prevent a Market Disruption, or to minimize the extent of a Market Disruption. The ISO reports Market Disruption occurrence in any of the following circumstances:

- When any of the ISO market processes fail to publish, including the Integrated Forward Market (IFM), Residual Unit Commitment (RUC), the Real-Time Market, which includes the Hour-Ahead Scheduling Process (HASP), Fifteen Minute Market (FMM), and the Real-Time Dispatch (RTD) processes;
- When the ISO manually overrides the closing of the Day-Ahead Market; or
- Any time that the ISO removes Bids from a CAISO Market to prevent a Market Disruption or to minimize the extent of a Market Disruption.

The Market Disruption report contains the following information:

- The frequency and types of actions taken by the ISO pursuant to Section 7.7.15;
- The nature of the Market Disruptions that caused the ISO to take action, or the Market Disruptions that were successfully prevented or minimized by the ISO as a result of taking action, and the ISO's rationale for taking such actions pursuant to Section 7.7.15;
- Information about the Bids (including Self-Schedules) removed pursuant to Section 7.7.15 (i.e., megawatt quantity, point of interconnection, specification of the Day-Ahead versus Real-Time Bid, and Energy or Ancillary Services Bid); and
- The ISO's rationale for its removal of Bids (including Self-Schedules) pursuant to Section 7.7.15.<sup>2</sup>

These system operation issues or System Emergencies are referred to in Sections 7.6 and 7.7, respectively, of the ISO Tariff. ISO Tariff, Appendix A, definition of Market Disruption. Capitalized terms not otherwise defined herein have the meanings set forth in the ISO Tariff.

<sup>&</sup>lt;sup>2</sup> *Id.* at P 29 & n.29.

## II. Report on Market Disruptions Occurring from October 16, 2014 through November 15, 2014

The ISO's report on Market Disruptions that occurred during the time period from October 16, 2014 through November 15, 2014, is provided in Table 1 and Attachment A below. Attachment A includes an entry for each reportable Market Disruption event and each entry also indicates:

- (1) The date of the Market Disruption;
- (2) The hour and Dispatch Interval when the Market Disruption ended;
- (3) The type of CAISO Market in which the Market Disruption occurred; and
- (4) A description of the nature of the Market Disruption, the nature of any actions taken by the ISO, the rationale for such actions, and the Market Disruption prevented or minimized as a result of taking such actions.

For each of the CAISO Markets, Table 1 lists the number of Market Disruptions and the number of times that the ISO removed Bids (including Self-Schedules) during the time period covered by this report. As shown in Table 1, there were a total of 116 Market Disruptions for the reporting period. Table 1 also indicates that the ISO did not remove any Bids (including Self-Schedules) in any of its markets during the reporting period.

On May 1, 2014, the ISO adopted its new FMM and fifteen minute scheduling in the real-time.<sup>3</sup>

**Table 1: Summary of Market Disruption Report** 

Type of CAISO Market	Market Disruption or Reportable Events	Removal of Bids (including Self- Schedules)		
Day-Ahead				
IFM	0	0		
RUC	0	0		
Real-Time				
Fifteen Minute Market Interval 1	3	0		
Fifteen Minute Market Interval 2	3	0		
Fifteen Minute Market Interval 3	11	0		
Fifteen Minute Market Interval 4	15	0		
Real-Time Dispatch	84	0		

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<sup>&</sup>lt;sup>3</sup> California Indep. Sys. Operator Corp., 146 FERC ¶ 61,204 (2014).

Table 1 above shows the market disruptions in the real time market in order to incorporate the FMM binding intervals.

The ISO has deployed and activated the full network model expansion of the fall 2014 release effective on trade date October 15, 2014. The ISO also deployed the Energy Imbalance Market (EIM) full binding production system on November 1, 2014.

Table 1 and Attachment A indicate that there were 29 instances of FMM and 3 instances of HASP disruptions during this reporting period. The count of FMM/RTD failures increased significantly, primarily due to implementation of FNM model and EIM markets. A majority of the RTD and FMM instances were caused due to patch deployment in the application after FNM implementation. The frequency of RTD failures increased from 40 to 84 failures in comparison to the October 2014 Report. RTD failures accounted for approximately 72 percent of all of the Market Disruptions during this reporting period.

The following dates were when the most failures occurred. On October 23, there were 5 FMM, 1 HASP and 16 RTD failures due to application problem. On October 31, there were 10 RTD, 4 FMM and 1 HASP failures due to patch promotion and issues with application. On November 5, there were 7 RTD and 2 FMM failures due to patch deployment after EIM implementation. There were 26 failures in current report period due to planned maintenance.

### **ATTACHMENT A**

# California Independent System Operator Corporation Market Disruption Report November 15, 2014

Table 3: Market Disruptions, Nature of Actions Taken by the California ISO, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
1	10/16/2014	1	1	RTD	RTD results were blocked and previous solution used.
2	10/16/2014	18	2	RTD	RTD Broadcast failed. Loss clearing payload and LMP filled from previous good interval.
3	10/16/2014	18	3	FMM	FMM did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval.
4	10/17/2014	17	8	RTD	RTD Broadcast failed. Loss clearing payload and LMP filled from previous good interval.
5	10/17/2014	17	9	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
6	10/17/2014	17	10	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
7	10/17/2014	17	11	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
8	10/19/2014	21	6	RTD	RTD failed due to application time-out. Loss clearing payload and LMP filled from previous good interval.
9	10/20/2014	14	3	FMM	FMM did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval.
10	10/20/2014	14	3	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
11	10/20/2014	14	4	FMM	FMM did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval.
12	10/20/2014	14	4	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
13	10/20/2014	14	5	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
14	10/20/2014	14	7	RTD	RTD Broadcast failed. Loss clearing payload and LMP filled from previous good interval.
15	10/21/2014	15	3	FMM	FMM failed due to application time-out. Loss clearing payload and LMP filled from previous good interval.
16	10/21/2014	15	3	RTD	RTD failed due to application time-out. Loss clearing payload and LMP filled from previous good interval.
17	10/21/2014	15	4	RTD	RTD failed due to application time-out. Loss clearing payload and LMP filled from previous good interval.

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
18	10/21/2014	15	5	RTD	RTD failed due to application time-out. Loss clearing payload and LMP filled from previous good interval.
19	10/21/2014	16	3	RTD	RTD failed due to application time-out. Loss clearing payload and LMP filled from previous good interval.
20	10/22/2014	14	3	FMM	FMM did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval.
21	10/22/2014	14	3	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
22	10/22/2014	14	4	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
23	10/23/2014	17	1	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
24	10/23/2014	17	2	HASP	HASP did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval.
25	10/23/2014	17	2	RTD	RTD failed due to application time-out. Loss clearing payload and LMP filled from previous good interval.
26	10/23/2014	17	3	FMM	FMM did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval.

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
27	10/23/2014	17	3	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
28	10/23/2014	17	4	FMM	FMM did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval.
29	10/23/2014	17	4	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
30	10/23/2014	17	5	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
31	10/23/2014	17	6	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
32	10/23/2014	17	7	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
33	10/23/2014	17	8	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
34	10/23/2014	17	9	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
35	10/23/2014	17	10	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
36	10/23/2014	17	11	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
37	10/23/2014	18	1	FMM	FMM did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval.
38	10/23/2014	21	3	FMM	FMM did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval.
39	10/23/2014	21	4	FMM	FMM did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval.
40	10/23/2014	21	4	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
41	10/23/2014	21	5	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
42	10/23/2014	21	6	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
43	10/23/2014	21	7	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
44	10/23/2014	21	8	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
45	10/27/2014	3	6	RTD	RTD failed due to application time-out. Loss clearing payload and LMP filled from previous good interval.

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
46	10/29/2014	21	3	FMM	FMM was run in manual, Planned maintenance
47	10/29/2014	21	3	RTD	RTD was run in manual, Planned maintenance
48	10/29/2014	21	4	FMM	FMM was run in manual, Planned maintenance
49	10/29/2014	21	4	RTD	RTD was run in manual, Planned maintenance
50	10/29/2014	21	5	RTD	RTD was run in manual, Planned maintenance
51	10/29/2014	21	6	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
52	10/29/2014	21	7	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
53	10/29/2014	21	8	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
54	10/29/2014	21	9	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
55	10/30/2014	24	3	FMM	FMM did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval.

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
56	10/30/2014	24	4	FMM	FMM did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval.
57	10/30/2014	24	11	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
58	10/30/2014	24	12	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
59	10/31/2014	1	1	FMM	FMM did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval.
60	10/31/2014	1	1	RTD	RTD Broadcast failed. Loss clearing payload and LMP filled from previous good interval.
61	10/31/2014	1	2	HASP	HASP did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval.
62	10/31/2014	4	3	FMM	FMM did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval.
63	10/31/2014	4	3	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
64	10/31/2014	4	4	FMM	FMM did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval.

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
65	10/31/2014	4	4	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
66	10/31/2014	4	5	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
67	10/31/2014	4	6	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
68	10/31/2014	15	8	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval. Contingency dispatch
69	10/31/2014	15	9	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval. Contingency dispatch
70	10/31/2014	15	10	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval. Contingency dispatch
71	10/31/2014	23	4	FMM	FMM did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval.
72	10/31/2014	23	6	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
73	10/31/2014	23	7	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
74	11/1/2014	1	1	RTD	RTD results were blocked and previous solution used.

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
75	11/1/2014	1	2	RTD	RTD results were blocked and previous solution used.
76	11/2/2014	1	4	RTD	RTD results were blocked and previous solution used.
77	11/3/2014	5	4	FMM	FMM did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval.
78	11/3/2014	5	7	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
79	11/3/2014	5	8	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
80	11/3/2014	20	1	RTD	RTD results were blocked and previous solution used.
81	11/3/2014	24	1	RTD	RTD results were blocked and previous solution used.
82	11/3/2014	24	2	RTD	RTD results were blocked and previous solution used.
83	11/3/2014	24	8	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
84	11/5/2014	3	6	RTD	RTD failed due to application time-out. Loss clearing payload and LMP filled from previous good interval.

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
85	11/5/2014	20	4	FMM	FMM was run in manual due to patch deployment, Planned maintenance
86	11/5/2014	20	7	RTD	RTD was run in manual due to patch deployment, Planned maintenance
87	11/5/2014	20	8	RTD	RTD was run in manual due to patch deployment, Planned maintenance
88	11/5/2014	20	9	RTD	RTD was run in manual due to patch deployment, Planned maintenance
89	11/5/2014	20	10	RTD	RTD was run in manual due to patch deployment, Planned maintenance
90	11/5/2014	20	11	RTD	RTD was run in manual due to patch deployment, Planned maintenance
91	11/5/2014	20	12	RTD	RTD was run in manual due to patch deployment, Planned maintenance
92	11/5/2014	21	1	FMM	FMM was run in manual due to patch deployment, Planned maintenance
93	11/7/2014	1	4	FMM	FMM was run in manual due to patch deployment, Planned maintenance
94	11/7/2014	1	7	RTD	RTD was run in manual due to patch deployment, Planned maintenance

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
95	11/7/2014	1	8	RTD	RTD was run in manual due to patch deployment, Planned maintenance
96	11/7/2014	1	9	RTD	RTD was run in manual due to patch deployment, Planned maintenance
97	11/7/2014	12	9	RTD	RTD Broadcast failed. Loss clearing payload and LMP filled from previous good interval.
98	11/7/2014	15	1	RTD	RTD results were blocked and previous solution used.
99	11/10/2014	2	4	FMM	FMM was run in manual due to patch deployment, Planned maintenance
100	11/10/2014	2	7	RTD	RTD was run in manual due to patch deployment, Planned maintenance
101	11/10/2014	2	8	RTD	RTD was run in manual due to patch deployment, Planned maintenance
102	11/10/2014	3	6	RTD	RTD Broadcast failed. Loss clearing payload and LMP filled from previous good interval.
103	11/10/2014	21	3	FMM	FMM did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval.
104	11/10/2014	21	4	FMM	FMM did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval.

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
105	11/10/2014	21	5	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
106	11/10/2014	21	6	RTD	RTD did not run due to application problem. Loss clearing payload and LMP filled from previous good interval.
107	11/11/2014	19	4	FMM	FMM did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval.
108	11/11/2014	19	7	RTD	RTD was run in manual due to patch deployment, Planned maintenance
109	11/12/2014	3	6	RTD	RTD failed due to application time-out. Loss clearing payload and LMP filled from previous good interval.
110	11/12/2014	24	3	FMM	FMM did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and resource awards for this interval. Planned maintenance
111	11/12/2014	24	4	FMM	FMM was run in manual due to DB promotion, Planned maintenance
112	11/12/2014	24	11	RTD	RTD was run in manual due to DB promotion, Planned maintenance
113	11/12/2014	24	12	RTD	RTD was run in manual due to DB promotion, Planned maintenance
114	11/13/2014	13	2	HASP	HASP did not run due to application problem. This interval was filled either automatically or interactively. MQS published Pnode clearing and

Count	Date	Hour	Interval	Market	Nature of Actions, Nature of Market Disruption, Rationale and/or Market Disruption Prevented or Minimized as a Result of such Actions
					resource awards for this interval.
115	11/14/2014	16	4	FMM	FMM was run in manual due to patch deployment, Planned maintenance
116	11/14/2014	16	8	RTD	RTD was run in manual due to patch deployment, Planned maintenance

#### Notes:

Integrated Forward Market (IFM): The Day-Ahead Market run in which the ISO conducts the market for purchases and sales of Energy for all hours of the next Trading Day based on submitted supply and demand bids, and performs the procurement of Ancillary Services.

Residual Unit Commitment (RUC): The Day-Ahead Market run in which the ISO conducts unit commitment of additional resources based on submitted availability bids and the forecast of demand for every hour of the next Trading Day.

Fifteen Minute Market (FMM) Interval 1: The first of a series of four market runs conducted every Trading Hour in advance of the Operating Hour. In this run the ISO conducts the Market Power Mitigation and Reliability Requirement Determination for submitted Bids, which applies to all of the Real-Time Market processes for the given Trading Hour. In this interval the ISO also conducts the procurement of incremental Ancillary Services from internal resources and dynamic external resources.

Fifteen Minute Market (FMM) Interval 2: The second of a series of four market runs conducted every Trading Hour in advance of the Operating Hour during which the ISO conducts the HASP. In the HASP, the ISO conducts the procurement and sale of Energy and Ancillary services from non-dynamic System Resources based on submitted Bids and the CAISO Forecast of CAISO Demand. In this interval the ISO also conducts the advisory procurement of incremental Ancillary Services from internal resources and dynamic external resources from T to T+60 minutes and procurement for the given Trading Hour.

Fifteen Minute Market (FMM) Interval 3: The third of a series of four market runs conducted every Trading Hour. During this interval the ISO conducts the commitment of internal Short-Start and Fast Start Units for the Time Horizon of T-30 minutes to T+240 minutes. In this interval the ISO also conducts the procurement of incremental Ancillary Services from internal resources and dynamic external resources for the given Trading Hour.

Fifteen Minute Market (FMM) Interval 4: The fourth of a series of four market runs conducted every Trading Hour. This interval is for the Fifteen Minute Market for the T-105 minutes to T+60 minutes time horizon. In this interval the ISO also conducts 15-minute Ancillary Service Awards for non-Hourly System Resources, internal resources and dynamic external resources for the given Trading Hour.

Department of Market Quality and Renewable Integration – California ISO
Real-Time Dispatch (RTD): The five minute interval of any given Operating Hour during which the ISO conducts the market for Energy based on submitted bids and the CAISO Forecast of CAISO Demand.
submitted bids and the CAISO Forecast of CAISO Demand.

#### **CERTIFICATE OF SERVICE**

I hereby 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 15<sup>th</sup> day of December, 2014.

Isl Anna Pascuzzo
Anna Pascuzzo