

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

California Independent System Operator Corp.))))	Docket No. ER22-878-000
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**SUPPLEMENTAL COMMENTS OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Pursuant to discussions with Commission Staff, the California Independent System Operator Corporation (“CAISO”) submits these supplemental comments regarding certain revisions to Appendix U to the CAISO tariff.¹ The CAISO reached out to each of the remaining interconnection customers impacted by these revisions, and the interconnection customers supported them. Sections 6.4 and 7.6 of Appendix U create anachronistic and unnecessary compliance obligations for both the CAISO and the interconnection customers. The CAISO’s annual reassessment studies every interconnection customer in the base case, including interconnection customers under older interconnection procedures.² The Appendix U restudy procedures only create unnecessary back-and-forth between the CAISO and interconnection customers, including the exchange of deposits that are not required.

¹ The CAISO submits these comments pursuant to Rules 212 and 214 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. §§ 385.212, 385.214.

² To provide accurate results for any interconnection customer, the reassessment must examine changes to the entire CAISO base case, which includes interconnection customers under older interconnection procedures. As a result, the CAISO already understands the impact any grid or queue change has upon older interconnection customers, and no separate “restudy” is required.

Although some cross-references to Sections 6.4 and 7.6 remain in Appendix U, these cross-references are inert³ and can be revised in the CAISO's regular tariff clarification filings.⁴

/s/ William H. Weaver

Roger E. Collanton
General Counsel
Sidney Mannheim
Assistant General Counsel
William H. Weaver
Senior Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630
(916) 608-1225
bweaver@caiso.com

*Counsel for the California Independent
System Operator Corporation*

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³ For example, a new interconnection customer would not be subject to Appendix U, so no new interconnection feasibility studies will occur.

⁴ See, e.g., CAISO, Tariff Clarifications Amendment, Docket No. ER20-2374-000 (July 10, 2020), available at <http://www.caiso.com/Documents/Jul10-2020-Tariff-Clarifications-Amendment-ER20-2374.pdf>.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each party listed on the official service list for this proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010 (2018)).

Dated at Folsom, California on this 11th day of March, 2022.

/s/ Jacqueline Meredith
Jacqueline Meredith