



California Independent
System Operator Corporation

March 23, 2023

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

**Re: California Independent System Operator Corporation
Amended Filing to Comply with Order No. 676-J
Docket Nos. ER23-426-____; ER23-427-____; RM05-5-029; RM05-5-030**

Dear Secretary Bose:

The California Independent System Operator Corporation (CAISO)¹ submits this filing in compliance with the Commission's Order No. 676-J² and its subsequent Order on Compliance and Request for Waivers,³ issued February 23, 2023. In Order No. 676-J, the Commission directed public utilities, including the CAISO, to incorporate in 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.

The CAISO filed for waiver of certain of these standards related to the WEQ cybersecurity and Parallel Flow Visualization (PFV) standards identified in Appendix I of Order No. 676-J, 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

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

² *Standards for Bus. Practices & Comm'n Protocols for Pub. Utils.*, Order No. 676-J, 175 FERC ¶ 61,139 (2021) ("Order No. 676-J").

³ *Order on Request for Waivers*, Docket Nos. ER23-426-001, ER23-427-000 and ER23-427-001 (February 23, 2023), 182 FERC ¶ 61,158 ("Waiver Order").

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 February 23, 2023.

I. Background

In Order No. 676-J, the Commission amended its regulations to incorporate by reference the latest version (Version 003.3) of specified business practice standards that NAESB filed with the Commission on March 30, 2020. The Version 003.3 NAESB standards include updates to standards that the Commission previously incorporated by reference into its regulations.

The Version 003.3 standards include revisions related to the surety assessment on cybersecurity performed by Sandia National Laboratories designed to strengthen the practices and cybersecurity protections established within the standards.⁵ The standards also include revisions to support new OASIS functionality that will allow for the posting of third party offers of planning redispatch services as well as providing additional information regarding the curtailment of firm transmission service.⁶ The standards also include changes that were made to support consistency with the North American Electric Reliability Corporation (NERC) Reliability Standards.⁷ The standards also include additions, revisions, and reservations made to the WEQ-008 Transmission Load Relief (TLR) – Eastern Interconnection Business Practice Standards, which NAESB advises completes the standards development effort for the PFV enhanced congestion management process.⁸ The standards also include five additional revisions to the OASIS suite of standards that were not made in response to Commission orders.⁹ In addition, the standards include revisions to the NAESB WEQ-023 Modeling Business Practice Standards.¹⁰ Finally, the Commission also revised 18 C.F.R. § 37.6(b)(2)(i) to

⁴ 182 FERC ¶ 61,158 at P 7.

⁵ Order No. 676-J at P 11.

⁶ *Id.* at P 12.

⁷ *Id.* at P 13.

⁸ *Id.* at P 14.

⁹ *Id.* at P 15.

¹⁰ *Id.* at P 16.

codify that the calculation of Available Transfer Capability (ATC) must be conducted in manner that is transparent, consistent with system conditions and outages for the relevant timeframe, and not unduly discriminatory or preferential.¹¹

Order No. 676-J requires public utilities to revise their open access transmission tariffs to include the WEQ Version 003.3 Standards in two separate compliance filings. Specifically, in accordance with the schedule set forth in Order No. 676-J, public utilities are required to submit compliance filings for the WEQ cybersecurity standards and the PFV standards nine months after the publication of Order No. 676-J in the Federal Registry (*i.e.*, March 2, 2022). Public utilities' compliance filings for the rest of the WEQ Version 003.3 Standards are due twelve months after implementation of the WEQ Version 003.2 Standards, or no earlier than October 27, 2022.

Regarding the WEQ cybersecurity and PFV standards, CAISO submitted its compliance filing and petition to waive certain of these standards on November 14, 2022, and amended on January 24, 2023. On February 23, 2023, the Commission issued its Waiver Order, granting CAISO's requests for waiver. Specifically, the Commission granted the CAISO's requests for continued waiver of the cybersecurity standards set forth in WEQ-001 (except for the WEQ-001-9 preamble text, WEQ-001-10 preamble text, WEQ-001-13.1.1, WEQ-001-13.1.4, WEQ-001-13.1.5, and WEQ-001-16) and WEQ-002. 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 standards granted waiver, to include a cite to the order granting the waiver requests.

II. Proposed Tariff Revisions

In accordance with Order No. 676-J, the CAISO has revised tariff section 7.3.3 to incorporate by reference WEQ-000 as set out in Appendix I of Order No. 676-J and 18 C.F.R. § 38.1 (2022). The CAISO also has incorporated by reference WEQ-008; however, this standard is inapplicable to the CAISO because it does not reside in the Eastern Interconnection. The CAISO also has revised tariff section 7.3.3 to list the WEQ-001 and WEQ-002 standards for which the CAISO has been granted a waiver and citing the Commission's Waiver Order, issued February 23, 2023. Adoption of the NAESB standards identified in Appendix I of Order No. 676-J does not require any substantive changes or revisions to the existing provisions of the CAISO tariff.

¹¹ *Id.* at P 38.

III. Contents of this Filing

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

Attachment A	Clean CAISO tariff sheets incorporating the compliance changes described above
Attachment B	Red-lined document showing the revisions contained in this compliance filing

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 the Waiver Order, and effective as of February 23, 2023.

Respectfully submitted,

/s/ John E. Spomer

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System Operator Corporation

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 23rd day of March, 2023.

/s/ Jacqueline Meredith

Jacqueline Meredith
An employee of the California ISO

Attachment A – Clean Tariff
NAESB Standards – Compliance Filing
California Independent System Operator Corporation
March 23, 2023

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-000, Abbreviations, Acronyms, and Definition of Terms (WEQ Version 003.3, March 30, 2020) (in accordance with paragraphs 49 to 51 of Commission Order No. 676-J, only the business practice standards in WEQ-000 that are included in the WEQ cybersecurity standards described in footnote 70 of Order No. 676-J);
- 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-008, Transmission Loading Relief (TLR) – Eastern Interconnection (WEQ Version 003.3, March 30, 2020) (in accordance with paragraphs 49 to 51 of Commission Order No. 676-J, only the business practice standards in WEQ-008 included in the PFV Standards as defined in Order No. 676-J);
- 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. ER23-426-001 and ER23-427-001 (February 23, 2023), 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 003.3, March 30, 2020), 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 003.3, March 30, 2020);
- 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 – Marked Tariff
NAESB Standards – Compliance Filing
California Independent System Operator Corporation
March 23, 2023

7.3.3 NAESB Standards

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- WEQ-000, Abbreviations, Acronyms, and Definition of Terms (WEQ Version 003.2, Dec. 8, 2017) (with minor correction applied July 23, 2019);
- WEQ-000, Abbreviations, Acronyms, and Definition of Terms (WEQ Version 003.3, March 30, 2020) (in accordance with paragraphs 49 to 51 of Commission Order No. 676-J, only the business practice standards in WEQ-000 that are included in the WEQ cybersecurity standards described in footnote 70 of Order No. 676-J);
- 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-008, Transmission Loading Relief (TLR) – Eastern Interconnection (WEQ Version 003.3, March 30, 2020) (in accordance with paragraphs 49 to 51 of Commission Order No. 676-J, only the business practice standards in WEQ-008 included in the PFV Standards as defined in Order No. 676-J);
- WEQ-011, Gas/ Electric Coordination (WEQ Version 003.2, Dec. 8, 2017);
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Pursuant to FERC's Order on Compliance and Request for Waivers, Docket Nos. ~~_____ER23-426-001~~ and ~~_____ER23-427-001 (February 23, 2023_____)~~, the CAISO has been granted a waiver of the following NAESB WEQ standards:

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- WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocols (S&CP), [OASIS] Version 2.2 (WEQ Version 003.3, March 30, 2020);
- 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;
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