

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

**California Independent System) Docket No. ER13-69-____
Operator Corporation)**

**MOTION FOR EXTENSION OF TIME OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
TO FILE INFORMATIONAL REPORT**

The California Independent System Operator Corporation (“CAISO”)¹ respectfully requests an extension of time until August 31, 2015 to file the informational report directed in the order issued in this proceeding on March 18, 2013.² The informational report requires the CAISO to compare the new real-time disturbance dispatch functionality, accepted by the Commission in this proceeding, with the pre-existing contingency dispatch functionality. Good cause exists to grant this extension of time because issues that arose during software testing of the disturbance dispatch functionality, which prevented the CAISO from implementing it until now. The software problems are now resolved and the CAISO is currently conducting operator training and plans to have the real-time disturbance dispatch functionality activated by June 30, 2014.

I. Background

In the March 18 order, the Commission accepted the CAISO’s proposed tariff revisions to provide the CAISO with the authority to implement an

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

² *California Independent System Operator Corp.*, 142 FERC ¶ 61,189 (2013) (“March 18 order”). The CAISO files this motion pursuant to Rules 212 and 2008(a) of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.212, 385.2008(a).

alternative mode of its existing real-time contingency dispatch of resources in the CAISO markets, referred to as real-time disturbance dispatch. The real-time disturbance dispatch would only be utilized in the event of a contingency event involving 300 MW or more of generation. In the event of such a contingency, CAISO operators could utilize either the pre-existing contingency dispatch or the real-time disturbance dispatch. The Commission accepted the tariff revisions effective March 18, 2013.³

The Commission also directed the CAISO to file a report with the Commission, for informational purposes, within 14 months after the CAISO's proposal was implemented. The Commission stated that the report should include data regarding how often the CAISO has used real-time disturbance dispatch and real-time contingency dispatch and what the response from participating generation has been regarding both modes of dispatch. In addition, the Commission stated that the report should include information about the cost impact associated with using the real-time disturbance dispatch as opposed to real-time contingency dispatch, the status of planned software enhancements regarding real-time dispatch, and a review of whether both the real-time contingency dispatch and real-time disturbance dispatch processes remain necessary given the additional data.⁴

³ See tariff sections 34.3.2, 34.5.

⁴ March 18 order at P 26. The Commission also explained that the informational report would not be publicly noticed in the Federal Register and the Commission would not act on it. *Id.* at P 26 n.40.

The CAISO has not yet implemented the alternative real-time disturbance dispatch mode in production, because during testing the CAISO discovered that implementing the software caused the existing reserve management display functionality to be inoperable, thereby prevent the CAISO from obtaining accurate data regarding operating reserves. Accordingly, since March 18, 2013, the CAISO continued to rely solely on the pre-existing real-time contingency dispatch.

The problem has now been addressed. The CAISO has tested the functionality and is currently conducting operator training and plans to activate the functionality in production on June 30, 2014.

II. Motion for Extension of Time

For good cause shown, the Commission should grant this motion for an extension of time until August 31, 2015 (*i.e.*, 14 months from the date the functionality will be implemented in production) to file the informational report required by the March 18 order. Good cause exists due to the implementation delays caused by the software issues discussed above and the lack of data to compare how resources respond between the two modes of contingency dispatch. As discussed above, the CAISO has now addressed the issue with the real-time disturbance dispatch software and plans to activate the software in production on June 30, 2014. Granting an extension of time until August 31, 2015 will provide the CAISO with 14 months to gather data and prepare the report, the same amount of time as directed in the March 18 order.

III. Conclusion

For the foregoing reasons, the CAISO respectfully requests that the Commission granting the requested extension of time until August 31, 2015 to file the informational report directed in the March 18 order.

Respectfully submitted,

Roger Collanton
General Counsel
Sidney M. Davies
Assistant General Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630
Tel: (916) 351-4400
Fax: (916) 608-7296
sdavies@caiso.com

Sean Atkins
Bradley R. Miliauskas
Alston & Bird LLP
The Atlantic Building
950 F Street, NW
Washington, DC 20004
Tel: (202) 239-3300
Fax: (202) 239-3333
sean.atkins@alston.com
bradley.miliauskas@alston.com

Counsel for the California Independent System Operator Corporation

Dated: May 19, 2014

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all of the parties listed on the official service list for the above-referenced 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, DC this 19th day of May, 2014.

/s/ Bradley R. Miliauskas
Bradley R. Miliauskas