

September 2, 2005

#### **VIA FEDERAL EXPRESS – PUBLIC VERSION**

The Honorable Magalie Roman Salas Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, DC 20426

> Re: **California Independent System Operator Corporation**,

Docket No. ER02-1656-009, -010, and -011 and Investigation of Wholesale Rates of Public Utility Sellers of Energy and Ancillary, Services in the Western Systems Coordinating

Council, Docket No. EL01-68-017

Dear Secretary Salas:

Enclosed for filing in the above-captioned dockets, please find an original and 14 copies of the Status Report of the California Independent System Operator Corporation ("CAISO"). These copies contain a redacted version of Attachment A. The CAISO is also submitting one copy marked CONFIDENTIAL, which has a nonredacted version of Attachment A. The CAISO requests privileged treatment for the instant filing pursuant to 18 C.F.R. § 388.112 because public disclosure of the entire contents of Attachment A would disclose confidential business information and jeopardize the CAISO's future negotiation with vendors regarding implementation of the market redesign.

Two additional copies of the public version of this filing are enclosed. Please date-stamp them and return them in the self-addressed prepaid Federal Express envelope.

Respectfully submitted,

Anthony J. Ivancovich Sidney Mannheim Davies

The California Independent System

**Operator Corporation** 151 Blue Ravine Road Folsom, CA 95630

Attorneys for the California Independent **System Operator Corporation** 

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

California Independent System Operator Corporation	) )	Docket No. ER02-1656-009
Investigation of Wholesale Rates of Public Utility Sellers of Energy and Ancillary Services in the Western Systems Coordinating Council	) ) ) )	Docket No. EL01-68-017

### STATUS REPORT OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION

The California Independent System Operator Corporation ("CAISO")<sup>1</sup> respectfully submits this monthly progress report ("Report") in compliance with the Commission's November 27, 2002 "Order Clarifying The California Market Redesign Implementation Schedule," 101 FERC ¶ 61,266 (2002) ("November 27 Order"), issued in the above-referenced dockets.

The November 27 Order required the CAISO to file reports on the first Monday of each month, beginning in January 2003, to update the Commission on the CAISO's progress in designing and implementing the market redesign effort.<sup>2</sup> The Commission directed the CAISO to file a full market redesign implementation plan, including a detailed timeline with the sequential and concurrent nature of the design elements, the software and vendors (once

This market redesign effort, previously known as "MD02", has been renamed Market Redesign & Technology Upgrade ("MRTU")

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Capitalized terms not otherwise defined herein are used in the sense given in the Master Definitions Supplement, Appendix A to the ISO Tariff.

selected) to be used and the cost estimates for each element. The November 27 Order required that the first report include explanations of the following: (1) any alternative methods of developing market redesign elements; (2) the CAISO's progress in developing the market redesign elements; (3) the action required to establish such elements; and (4) a detailed breakdown of the total start-up costs.<sup>3</sup> The Commission directed the CAISO to update the market redesign implementation plan on a monthly basis, indicating the progress made and the upcoming steps.

On January 10, 2003, the CAISO filed its first Status Report in compliance with the November 27 Order. Subsequent to the first filing, the CAISO continues to file monthly Status Reports with the Commission on the first Monday of each month. The instant Report is intended to satisfy the monthly reporting requirement in the November 27 Order, update the information included in prior Status Reports and generally advise the Commission of the current status of the market redesign implementation effort.

#### I. SEPTEMBER STATUS REPORT

Section A includes a narrative of the Market Redesign and Technology

Upgrade Program along with the current status of the seven major system

projects.<sup>4</sup> Section B includes a narrative regarding the budget along with an

updated Budget Tracking and Status Report.<sup>5</sup> Section C identifies the CAISO's

key market redesign implementation issues including the previous month's

accomplishments, major milestones, upcoming activities, issue resolution with

November 27 Order at P 9.

The major milestones for the MRTU projects are included in Attachment B.

stakeholders and items requiring timely resolution by the Commission in order to meet the project schedule.

#### A. Market Redesign and Technology Upgrade Program

The Market Redesign and Technology Upgrade ("MRTU") Program is comprised of seven major system projects – (1) Integrated Forward Markets/Real-Time Market/Full Network Model ("IFM/RTM/FNM"), (2) Scheduling Infrastructure Business Rules ("SIBR"), (3) Congestion Revenue Rights ("CRR"), (4) Settlements and Market Clearing ("SaMC"), (5) Legacy Systems, (6) Master File Redesign ("MFRD") and (7) Post Transaction Repository ("PTR"). The aforementioned projects are at different stages of implementation, but are projected to converge by January 2006 for system integration and integration testing. Attachment B – MRTU Update – is a graphical depiction that provides the current status for each of the MRTU projects during the various stages of implementation, including design, development, pre-factory acceptance testing, factory acceptance testing and site acceptance testing.

### B. Market Redesign Budget Update

Attachment A -- the Budget Status and Tracking Report (which remains confidential) – summarizes expected cost at completion compared to the May 2004 budget. Specifically, Attachment A shows the program budget amount, actual costs to date, estimated costs to complete and the project cost at completion.

<sup>&</sup>lt;sup>5</sup> The narrative includes only non-confidential information.

### C. Key Issues

### 1. Resolution of Open Design and Policy Issues

The CAISO held two sets of Market Redesign and Technology Upgrade

Stakeholder meetings on August 16 – 18 and August 30 – September 1, 2005.

The primary focus of the meetings was to resolve the remaining outstanding

MRTU issues and discuss the CAISO's responses to stakeholders' comments on the MRTU Tariff language.

Discussion topics for the August 16-18 meeting included:

- 1. Update on Simplified and Reorganized Tariff
- Discussion about CAISO's responses to MRTU Tariff Part 1
- 3. Resource Adequacy MRTU Integrations Issues
  - a. Partial RA Units
  - b. Treatment of Use-limited Resources
  - c. Obligation for Short Start Units
  - d. Non-CPUC Jurisdictional Entities
  - e. Multi-Day Unit Commitment
- 4. Market Power Mitigation Issues
  - a. Competitive Path Assessment
  - b. Frequently Mitigated Units Bid Adder
  - c. Default Energy Bid issues
- 5. Outstanding ETC issues
  - a. Losses and other settlement charges
  - b. Validation

- 6. Inter-tie Pre-Dispatch Pricing
- 7. Trading Hubs
- 8. CRR Study 2 Report and Results
- 9. CRR Allocation Rules
  - a. Proposed Rules for LSEs serving internal load
  - b. Proposal for Out of Control Area load
  - c. Proposal for Merchant Transmission

Discussion topics for the August 30 – September 1 meeting included:

- 1. General Overview: Redesigned Market Process and Timeline
- 2. Resource Adequacy MRTU Integrations Issues
  - a. RA-based Must-Offer Obligation
  - b. Local Reliability Backstop
- 3. Day-Ahead/Real-Time Market Design Issues
  - a. Ancillary Services Pricing in HASP and Real-Time
  - b. Inter-SC Trades of Ancillary Services
  - c. Integration of Participating Intermittent Resources (PIRP) with MRTU
  - d. Treatment of Losses on ETC Schedules
- 4. CRR Study 2: Final Report and Results
- 5. LMP Study 3B
- 6. CRR Allocation Rule
  - a. Proposed Rules for LSEs Serving Internal Load
  - b. Proposed Rules for Merchant Transmission

7. Update on MRTU Tariff process, including Simplified and

Reorganized Tariff

8. Discussion about CAISO's responses to MRTU Tariff – Part 1 & 2

The next MRTU stakeholder meeting is scheduled for September 20-22, 2005.

II. CONCLUSION

In Section I of this Report, the CAISO has responded to the Commission's

request for specific information on progress, critical issues, budget and

alternative methods for the market redesign implementation effort. The CAISO

appreciates having the opportunity to comment and report on the progress being

made on its market redesign.

Respectfully submitted,

Charles F. Robinson

Anthony J. Ivancovich

Sidney Mannheim Davies

Counsel for the California Independent

**System Operator Corporation** 

Dated: September 2, 2005

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# ATTACHMENT A REDACTED

### **ATTACHMENT B**

### **Major Projects**

### Integrated Forward Markets/Real-time Market/Full Network Model - IFM

integrated i of ward markets/iteal-time market/i dir ivetwork model - ii m								
12/31	1/0	9/15/0	3/1/0	5 5/30/0	9/15/0	12/15/0	0	
CONTRACT	DESIGN	DEVELO	OPMENT	PRE FAT	FAT	SAT		
Scheduling Infrastructure Business Rules – SIBR  8/15/0 3/1/0 8/1/0 10/1/0 12/1/0 1/1/0								
CONTRACT	DESIGN		OPMENT	PRE FAT	FAT	SAT		
Congestion Revenue Rights - CRR  11/15/0 6/1/0 9/15/0 10/15/0 12/1/0 1/1/06								
CONTRACT	DESIGN	DEVELO	OPMENT	PRE FAT	FAT	SAT		
Testing LEGE	END							

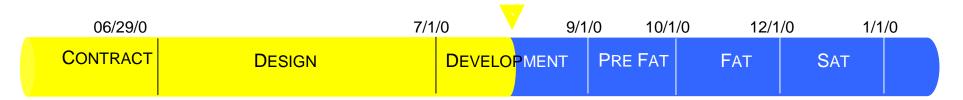
Pre- Factory Acceptance Testing (Pre-FAT): Vendor test of system functionality and performance with ISO review Factory Acceptance Testing (FAT): Formal test at vendor facility to confirm system functionality and performance with ISO Site Acceptance Testing (SAT): Formal test at ISO to confirm system functionality and performance

## Major Projects

### **SETTLEMENTS, STAGE 1 - SaMC**

06/29/0	1/15	/0 3/1/0	5/1/0	10/1 7/1		
CONTRACT	DESIGN	DEVELOPMENT	PRE FAT	FAT	SAT	

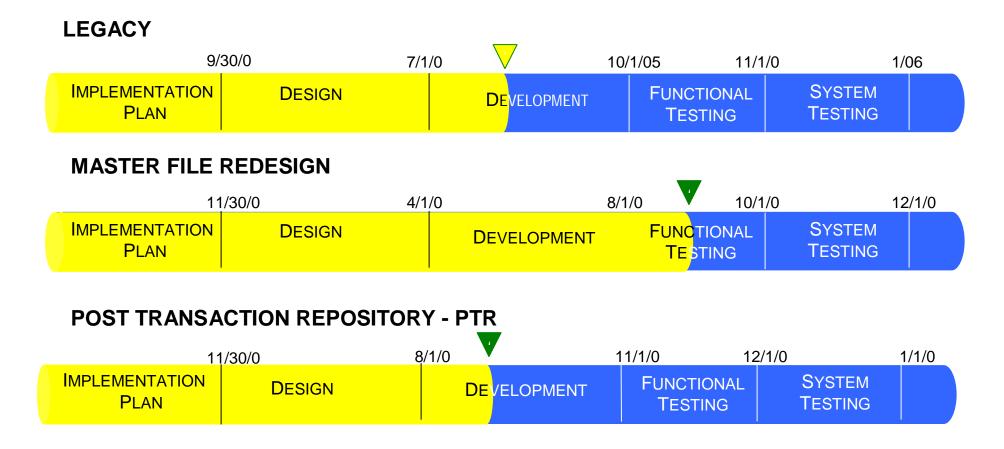
### **SETTLEMENTS, STAGE 2 - SaMC**



### **MARKET CLEARING - SaMC**

7/19/0	12/1	5/0 3/15/0	5/1	5/0 8/1/0	
CONTRACT	DESIGN	DEVELOPMENT	FAT	SAT	

### Internally Developed Projects



#### **CERTIFICATE OF SERVICE**

I hereby certify that I have caused the public version of the foregoing document to be served upon the Public Utilities Commission of the State of California and upon all parties of the official service lists maintained by the Secretary for Docket Nos. ER02-1656-000 and EL01-68-017.

Dated at Folsom, California, this 2<sup>nd</sup> day of September 2005.

Sidney Mannheim Davies