



scheduling requirement and many of the related Tariff revisions,<sup>2</sup> some parties intervening in this proceeding also raise concerns about elements of Amendment No. 72 or request clarifications or modifications of the amendment. Other parties oppose Amendment No. 72. Some parties raise issues that the CAISO already addressed in the September 22 filing letter accompanying Amendment No. 72,<sup>3</sup> and the CAISO will not revisit these issues in this Answer. Other parties raise new issues or requests for clarification, and the CAISO believes a response to these comments will assist the Commission in considering Amendment No. 72. The CAISO hereby requests leave to file an answer, and files its answer, to the comments and protests submitted in this proceeding.<sup>4</sup>

For the reasons set forth below, and in the September 22 filing letter, the Commission should accept Amendment No. 72, with only such clarifying modifications as the CAISO has committed to make in this Answer.

## **I. STATEMENT OF ISSUES**

In accordance with Rule 203 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.203(a)(7) (2005), the CAISO requests that the Commission act on the following issue:

---

Electric Company ("SDG&E"); Sempra Energy Solutions ("SES"); Southern California Edison Company ("SCE"); and Williams Power Company, Inc. ("Williams").

<sup>2</sup> See, e.g., the comments of SCE, SWP, Williams, MWD, CMUA, and Six Cities.

<sup>3</sup> See, e.g., the comments of PG&E/TURN.

<sup>4</sup> To the extent this answer is deemed an answer to protests, the CAISO requests waiver of Rule 213 (18 C.F.R § 385.213) to permit it to make this answer. Good cause for this waiver exists here because the answer will aid the Commission in understanding the issues in the proceeding, provide additional information to assist the Commission in the decision-making process, and help to ensure a complete and accurate record in this case. See, e.g., *Entergy Services, Inc.*, 101 FERC ¶ 61,289, at 62,163 (2002); *Duke Energy Corporation*, 100 FERC ¶ 61,251, at 61,886 (2002); *Delmarva Power & Light Company*, 93 FERC ¶ 61,098, at 61,259 (2000).

1. Whether the proposed changes to the CAISO Tariff are just and reasonable pursuant to Section 205 of the Federal Power Act.

## **II. ANSWER**

### **A. Amendment No. 72 Will Enhance the Reliability of the CAISO Controlled Grid**

SDG&E argues that the CAISO has offered no evidence that the scheduling requirements in Amendment No. 72 will actually improve reliability. SDG&E at 5- 6. This comment ignores the extensive discussion of reliability concerns in the CAISO's September 22 filing letter. Specifically, SDG&E claims that the Amendment No. 72 scheduling requirements would not address the need to commit specific generating units to satisfy local and zonal requirements. SDG&E at 5. This argument disregards the fact that the 95 percent scheduling requirement in Section 2.2.7.2.1.1, as well as the requirement to identify resources to meet all forecast Demand in Section 2.2.7.2.1.2, apply separately to each SC's forecast Demand for each UDC Service Area. The requirement to identify sufficient resources to meet each SC's Demand in each UDC Service Area will ensure that resources are available to satisfy Service Area level requirements and will allow CAISO operators to focus their efforts on addressing more local needs. In addition, the scheduling of sufficient resources to meet Demand in each UDC Service Area will substantially increase the likelihood that resources scheduled to meet system Demand will also meet local resource requirements.

### **B. Amendment No. 72 Does Not Create a New "Enforcement Protocol"**

SDG&E also opposes Amendment No. 72 by arguing that the amendment will create an "enforcement protocol" that could have negative commercial consequences. SDG&E at 6. This argument is groundless. Amendment No. 72 does not establish any

new authority for the CAISO to take enforcement actions in response to underscheduling, beyond those already included in the CAISO's Enforcement Protocol. In addition, the amendment is not intended to establish any new authority for the Commission to take action in response to underscheduling.

In the context of previous proceedings and orders, the Commission has already indicated that it believes that underscheduling constitutes a form of "gaming," manipulation, and/or false information that violated provisions of the CAISO Market Monitoring and Information Protocol ("MMIP"). See *American Electric Power Service Corp., et al.*, Order to Show Cause Concerning Gaming and/or Anomalous Market Behavior, 103 FERC ¶ 61,345 at PP 56-58 (2003) ("June 2003 Order"). In that order, the Commission indicated that it was not issuing any financial sanctions to address underscheduling activities because: (i) the Commission's authority at that time was limited to extracting profits earned from tariff violations, and (ii) the Commission concluded that there were no profits associated with the underscheduling.

Since these rulings in the Show Cause proceedings, the Commission has required the CAISO to remove provisions in its MMIP that were found to prohibit underscheduling or overscheduling in the June 2003 Order, but has established new CAISO and Commission market behavior rules prohibiting market manipulation and the submission of false information, as set forth in the CAISO's Enforcement Protocol ("EP") and the Commission's Market Behavior Rules. See *Investigation of Terms and Conditions of Public Utility Market-Based Rate Authorizations*, 105 FERC ¶ 61,218 (2003); *California Independent System Operator Corp.*, 106 FERC ¶ 61,179 (2004), *modified on remand*, 112 FERC ¶ 61,001 (2005). CAISO and Commission rules

prohibiting market manipulation include provisions against provision of False Information, which is specifically defined as including “inaccurate load or generation data.” See EP 7.3 (a) and Market Behavior Rule 2. However, authority to issue any sanctions under these rules rests solely with the Commission. See EP 7.3 (b). In addition, it is worth noting that the Energy Policy Act of 2005 recently expanded the Commission’s authority to issue sanctions under the Federal Power Act, including the authority to issue penalties of up to \$1 million per day. EP Act 2005, section 314(b)(1). The Commission therefore may already have the authority to impose sanctions for underscheduling under behavior rules such as the prohibition on the submission of “inaccurate load or generation data.” This prohibition could encompass the submission of schedules that do not accurately reflect an entity’s forecast Demand, in accordance with the forward scheduling requirement of Amendment No. 72.

As part of the CAISO’s ongoing obligation to notify the Commission’s Office of Market Oversight and Investigations (“OMOI”) of any potential violations of market rules, the CAISO has confirmed that OMOI is aware that both underscheduling and overscheduling have occurred. Under the Commission’s rules, OMOI staff would need to open a formal investigation within 90 days of becoming aware of any potential violation of Market Behavior Rules. Because the Commission conducts such investigations on a confidential basis, the extent to which the Commission may view underscheduling as a violation of market rules such as the prohibition on the submission of “inaccurate load or generation data,” and any actions that the Commission may be contemplating in response to such activities are unknown at this time. Nonetheless, Amendment No. 72 does not in any way change these market rules or the

Commission's authority to initiate enforcement actions or levy sanctions – it merely establishes a benchmark for the level of forward scheduling that the CAISO believes should be required in the Day-Ahead timeframe.

**C. Amendment No. 72 Ensures That FERC Has Sufficient Information on Underscheduling to Determine Whether to Exercise Its Existing Enforcement and Sanction Authority**

IEP requests that the CAISO be required to report to the Commission, on a confidential basis, the CAISO's analysis of the scheduling data submitted by SCs to comply with Amendment No. 72 so that the Commission can make decisions about whether there is a need for specific enforcement action. IEP at 3. As indicated in the September 22 filing letter, data on underscheduling provided by SCs pursuant to comply with the Amendment, including any relevant CAISO analysis of that data, will be routinely provided to the Commission, consistent with the CAISO's obligation to notify the Commission of potential market rule violations in accordance with Section 8.2 of the EP and FERC Market Behavior Rules.<sup>5</sup>

A number of parties argue that there should be limitations or conditions on the scheduling data and underscheduling information that the CAISO reports to the Commission. The CAISO does not believe these conditions or limitations are appropriate. Instead, the CAISO believes it is necessary to forward all data related to underscheduling to the Commission so that the OMOI can exercise its authority and responsibility to determine whether any further action is justified.<sup>6</sup>

---

<sup>5</sup> See *Market Monitoring Units in Regional Transmission Organizations and Independent System Operators*, Policy Statement on Market Monitoring Units, 111 FERC ¶ 61,267 at P 6, and Appendix A thereto at P 4 (2005).

<sup>6</sup> *Id.*

For example, Six Cities requests that the Amendment No. 72 tariff language be revised so that only “recurring” underscheduling is reported to FERC. Six Cities at 7-8. Similarly, AREM contends that Amendment 72 should not apply to SCs that are not investor-owned utilities, because it will be administratively burdensome for small Load-Serving Entities to meet the Amendment No. 72 reporting requirements, and the reporting requirement should only be imposed on SCs that have demonstrated a pattern of under-scheduling. AREM at 3, 5.

These comments miss the point that data on underscheduling from all SCs will be submitted to the Commission so that the Commission itself can determine which entities are engaged in “chronic underscheduling” or any behavior that FERC believes may violate market behavior rules. Only the Commission can determine what level or frequency of underscheduling may constitute a violation of current CAISO and Commission market rules prohibiting the submission of “inaccurate load or generation data” or other potential forms of market manipulation and false information. Moreover, the CAISO believes that the requirement to submit reports on their scheduling practices will allow each SC to self-police its own scheduling practices, thereby allowing each SC to correct “recurring underscheduling” before the Commission may take action.

SES claims that the reporting requirement should only apply to those SCs whose scheduling practices are creating problems for the CAISO and proposes a “materiality threshold” of 100 MW, 2 percent of the CAISO’s peak load or 10 percent of forecast load whichever is higher. SES at 4-5. The CAISO believes that some type of thresholds are or will be used by the OMOI in assessing if underscheduling is a violation of CAISO and Commission market rules such as the prohibition on the submission of

“inaccurate load or generation data.” However, incorporating such a threshold directly into the reporting requirement would not reduce any administrative burden since SCs would need to perform these calculations for all hours anyways to determine if such thresholds were exceeded or not. In addition, using any threshold based on overall system conditions and/or the collective scheduling of all SC, as SES seems to suggest, would create additional complexity and potential disputes, and increase – rather than decrease—any administrative burden associated with reporting requirements.<sup>7</sup> Lastly, the CAISO believes that having the data for all hours will provide the Commission, the CAISO and the SCs with a better basis for assessing overall trends in scheduling, Demand forecast errors, *etc.*

SCE urges the Commission to order the CAISO to implement a process whereby the CAISO will allow a SC to address any perceived under-scheduling events prior to the CAISO notifying the Commission. SCE at 5. The reporting requirements under Amendment No. 72 do precisely this, by ensuring that each SC is aware of any underscheduling events prior to the time reports are submitted to the CAISO and/or provided to the Commission. The CAISO also notes that it has developed a standardized template for submission of reports to comply with Amendment No. 72. A copy of that template is provided as Attachment 1 to this Answer. This template includes a “notes” field which will allow an SC to provide explanatory information for any underscheduling event during any hour in the report. In response to these and similar comments, the CAISO proposes to include a final version of this template as a

---

<sup>7</sup> In addition, the CAISO notes that a 100 MW threshold could be considered excessive for an SC responsible for a relatively small amount of Demand since the 100 MW could represent a very large percentage of the SCs Demand.



supplement to the Amendment No. 72 tariff provisions to be submitted in a compliance filing.

PG&E/TURN argue that the CAISO's reporting of underscheduling behavior should be limited to scheduling variances that are not accounted for by unpredicted changes in circumstances, including weather variations. PG&E/TURN at 12. The CAISO assumes that the any extenuating circumstances that affect Demand scheduling will be taken into consideration by the OMOI in assessing whether underscheduling activity is a violation of market rules such as the prohibition on the submission of "inaccurate load or generation data." In addition, the standardized template for submitting reports to the CAISO will include a notes field that will allow SCs to identify unpredicted changes in circumstances, such as weather variations, that precipitated underscheduling.

On a related issue, Six Cities argues that the CAISO should not keep historical Demand data submitted by an SC to comply with Section 2.2.12.3 confidential for more than two months, and if it is deemed market sensitive, the CAISO should aggregate it by SC. Six Cities at 6-7. Six Cities contends that publication of historic SC-specific Demand and scheduling data is appropriate because it will facilitate the filing of complaints by Market Participants. The CAISO believes this request is inconsistent with the general treatment of confidential data under Section 20.3 of the CAISO Tariff. Under Section 20.3.2, the CAISO is required to maintain the confidentiality of various SC-specific data, including individual bids and inter-SC transactions. The CAISO believes the SC-specific Demand and scheduling data submitted to comply with Section 2.2.12.3 is of a sensitive nature comparable to the data already subject to the

confidentiality provisions of Section 20.3. As such, confidential treatment of this data is justified. Six Cities provides no reason as to why SC-specific Demand and scheduling data should receive less protection than other types of market-sensitive data that could, presumably, also facilitate the filing of complaints by Market Participants, were such data to be released by the CAISO.

Moreover, pursuant to Section 20.3.4, the CAISO may provide such information to the Commission without first issuing a market notice if the Commission, or its staff, requests such information in the course of an investigation or otherwise. Thus the Commission often has access to SC-specific data that the CAISO is required to keep confidential, notwithstanding the fact that the publication of such data potentially could facilitate complaints by Market Participants.

SCE request that the confidentiality provisions of Section 20.3.2(f) be expanded to include the list of resources provided to comply with Section 2.2.7.2.1.2. SCE at 4. The CAISO does not oppose this proposed change and is prepared to so revise Section 20.3.2(f) in a compliance filing.

SWP argues that certain existing restrictions on the release of aggregate Demand data under Section 2.2.12.3 of the CAISO Tariff should be eliminated so that entities other than UDCs would receive aggregate Demand data for each UDC Service Area. SWP at 8. SWP claims that such data must be available to all SCs to comply with Amendment No. 72. This is incorrect. As clarified in Section II.E of this Answer below, the scheduling requirements under Amendment No. 72 apply to the forecast Demand for each SC, and SCs are not required to know the aggregate forecast

Demand in each UDC Service Area. SWP's requested changes to the CAISO Tariff go beyond the scope of Amendment No. 72 and should be rejected.

**D. Amendment No. 72 Reporting Requirements Do Not Create an Inappropriate Administrative Burden**

A number of commenters claim that the reporting requirements established by Amendment No. 72 create an undue administrative burden. See, e.g., CMUA at 4-5, AREM at 5; MWD at 2. These comments substantially over-state the administrative effort required to comply with these reporting requirements while disregarding the valuable "self-policing" that will result from preparation of the reports required by Amendment No. 72.

The calculations and comparison of Demand forecasts, schedules and actual Demand that are incorporated in the informational reporting requirements of Amendment No. 72 will ensure that SCs perform some basic level of "self-checking" of their own scheduling and forecasting practices. For example, in order to ensure that they are scheduling to meet 95 percent of their Demand forecast within each UDC Service Area, SCs must sum up all of their Demand schedules in each UDC Service Area and compare this to their Demand forecast. Similarly, in order to monitor the accuracy of their Demand forecasts, SCs should already sum up their estimated and actual Demand after-the-fact and compare this to their forecast. If SCs are not currently doing this, the Amendment No. 72 reporting requirements will require them to do so, thereby ensuring compliance with scheduling requirements and improving Demand forecasting.

The informational reporting requirements in Amendment No. 72 should involve little, if any, additional administrative effort by SCs because SC's should already be

performing the calculations and comparison of Demand forecasts, schedules and actual loads that are incorporated in the informational reporting requirements of Amendment No. 72. Any additional “administrative burden” involved in doing these calculations represents a basic cost of doing business that is highly cost effective in terms of overall system reliability and commitment of resources.<sup>8</sup>

Having SCs – rather than the CAISO – do these calculations will also create higher benefits at lower costs. Although the CAISO may have the underlying data to develop the weekly reports required by Amendment No. 72, the cost to the CAISO of doing this is higher than the cost of having each SC perform and validate its own calculations. In addition, the benefits of having SC’s perform these calculations (in terms of ensuring a higher compliance rate with scheduling requirements and improving the Demand forecasting ability of SCs) are much higher than if the CAISO does this. For example, having the CAISO sum up and compare actual Demand to forecasted Demand and scheduled Demand several months after the fact will do little if anything to identify and prevent forecasting and scheduling errors shortly after they occur, and improve Demand forecasting of each SC over the longer term.

If the CAISO is required to perform these calculations in the first instance, there is also a greater chance of error and dispute. Although the CAISO may ultimately have the data to create the reports required under Amendment No. 72, there is greater chance of error and dispute if the CAISO must do these calculations for each SC. For

---

<sup>8</sup> In order to further minimize any administrative burden associated with the final weekly data report, the CAISO is proposing to extend the due date for this report from 60 days after the submission date of the preliminary weekly report to 85 days after the end of each respective week, so that the data required by Section 2.2.12.3.3 will be due at least 7 days after the final due date for submitting revised metering data pursuant to the CAISO payment calendar. This is discussed in more detail below in response to a comment by SCE.

example, relatively simple data matching, merging, or metering errors will be more readily apparent to an individual SC that is working with and reviewing its own data, than to CAISO staff.

Failure to require SCs to submit the required report will ultimately reduce the level of market monitoring and analysis the CAISO will be able to provide on this and other issues. The CAISO's Department of Market Monitoring ("DMM") has the responsibility of any monitoring of compliance with the scheduling requirements of Amendment No. 66, along with all other issues related to the CAISO's Enforcement Protocols and the Commission's market behavior rules. The reporting requirements incorporated into Amendment No. 72 were designed to enable DMM to review general SC compliance with Amendment No. 72's scheduling requirements without the use of DMM resources to perform and validate the detailed calculations for each SC. Given budgetary and staff limitations, the CAISO believes DMM's limited resources are most effectively focused on periodic review and analysis of data to be included in the reports (and on DMM's other more critical market monitoring, analysis and design responsibilities), rather than on performing the underlying calculations that SC are better able to perform themselves based on their own scheduling, forecasting and metering data. In short, there would be a significant opportunity cost if DMM were to do these detailed calculations for each SC for each hour of each day, in terms of reduced DMM resources that are available for more important forms of market monitoring, analysis and design.

SCE states that the requirement to submit final weekly information under Section 2.2.12.3.3 should be rejected as unnecessary because final data comes in too late to

aid in short-term compliance monitoring and could result in data disputes. SCE at 3-4. The CAISO agrees that the final weekly report comes in too late to aid in short-term compliance monitoring, and notes that this is the reason a preliminary weekly report is required under Amendment No. 72. However, the CAISO, and in particular, the CAISO's Department of Market Monitoring, believes the final weekly report is essential to provide the CAISO and the Commission with a basis for assessing actual compliance with scheduling requirements, Demand forecasting accuracy, and compliance with market rules concerning accurate information cited above. The final weekly report is essential to avoid data accuracy disputes.

In order to further minimize any administrative burden and data disputes associated with the final report, the CAISO is proposing to extend the due date for this report from 60 days after the submission of the preliminary weekly report to 85 days after the end of each respective week, so that the final weekly report is due at least 7 days after the final due date for submitting revised metering data pursuant to the CAISO payment calendar. The CAISO is prepared to make this change to Section 2.2.12.3.3 in a compliance filing.

Six Cities contends that the Commission should require the submission of final weekly data only if it differs from the preliminary weekly data. Six Cities at 5-6. The final weekly report is needed to confirm that an SC has verified the accuracy of the preliminary data. It is a simple matter for an SC to simply resend a previous report. Submission of the scheduling data in a final report will provide the CAISO with an affirmation that the final data are not different from preliminary data and will therefore prevent future disputes.

SWP argues that the requirement to file a final report should only be imposed on SCs who have been informed by the CAISO that they have failed to substantially comply with the 95 percent scheduling requirement. SWP at 6-8. Again, such a limitation would discourage SCs from identifying and correcting Demand scheduling and forecasting problems themselves on an expeditious basis. In addition, for the reasons discussed above, it is more efficient for each SC to prepare the data and calculations for its own report even if the SC is complying with the scheduling requirements.

**E. The Requirement to Submit a List of Resources if a Scheduling Coordinator Fails to Submit a Day-Ahead Schedule That Reflects 100% of Its Forecast Demand Is Appropriate**

SCE requests that Section 2.2.7.2.1.2 be modified to clarify that the listing of resources that the SC plans to rely upon during the Trading Day to meet its forecast peak Demand requirement does not create a commitment that the SC will use those resources. SCE at 5. The CAISO notes that nothing in the proposed Tariff language creates a binding commitment for an SC to use a particular listed resource. As such, the requested clarification is not necessary. The CAISO stresses, however, that each of the resources listed to comply with Section 2.2.7.2.1.2 must truly be available for the CAISO to call upon to meet Demand in Real-Time. Listing of resources that the CAISO cannot dispatch via normal means would not satisfy the requirements of Section 2.2.7.2.1.2.

CMUA requests clarification of Section 2.2.7.2.1.2. CMUA suggests that the language “forecast Demand for the peak hour of that Trading Day in each applicable UDC Service Area” creates ambiguity with respect to the responsibilities of SCs because not all SCs are UDCs. CMUA at 3-4. CMUA believes the language could be

interpreted as requiring SCs to have knowledge of which hour the total Demand in the larger UDC Service Area will peak. CMUA recommends changing the language to suggest that each SC's responsibility is to meet "its forecast Demand." SWP raises a similar concern, noting that non-UDC Scheduling Coordinators will not know the "peak hour" of aggregate Demand in each UDC Service Area. SWP states that the language of Section 2.2.7.2.1.2 is susceptible to multiple interpretations. SWP at 4-5.<sup>9</sup>

The CAISO agrees that each SC should be responsible only for scheduling to satisfy its own forecast Demand during the projected peak hour of a Trading Day, and that individual SCs need not be responsible for forecasting the aggregate Demand of all SCs in a given UDC Service Area. The CAISO emphasizes, however, that each SC is responsible for forecasting its own peak Demand in each Trading Day and must satisfy the scheduling requirements of Amendment No. 72 separately for each UDC Service Area. In order to clarify this requirement, the CAISO proposes to make the following revisions to the filed Tariff language in a compliance filing:

**2.2.7.2.1.2** To the extent that a Scheduling Coordinator submits a Day-Ahead Schedule that reflects less than one hundred percent (100%) of the ~~its entire~~ forecast Demand for such Scheduling Coordinator for the peak hour of that Trading Day in each applicable UDC Service Area, as set forth in Section 2.2.7.2.1.1, that Scheduling Coordinator must submit, along with its Day-Ahead Schedule, a list of the resources that the Scheduling Coordinator plans to rely upon during that Trading Day to meet its forecast peak Demand requirement.

**F. Amendment No. 72 is Not Inconsistent with WECC Scheduling Protocols**

Six Cities requests that Section 2.2.7.2.1.1 be revised to clarify that the CAISO will continue to accept "two-day ahead" schedules for weekends and holidays, consistent with existing scheduling timelines in other portions of the Western Electricity

---

<sup>9</sup> Similar concerns were raised by MWD. MWD at 8.



Coordinating Council (“WECC”). Six Cities at 4-5. The CAISO clarifies that the requirement in Section 2.2.7.2.1.1 to submit Day-Ahead Schedules “for each hour of each Trading Day” does not preclude the submission of such “two-day ahead” schedules under WECC scheduling protocols. The CAISO does not believe revisions to the Tariff language are necessary, however, since the requirements applicable to Day-Ahead Schedules in other provisions of the CAISO Tariff already have sufficient flexibility to accommodate these WECC scheduling protocols.

#### **G. Relationship With MRTU Implementation**

A number of parties comment that the requirements established by Amendment No. 72 should be eliminated once the Market Redesign and Technology Upgrade (“MRTU”) market rules and related market design changes, including the Resource Adequacy requirements being developed by the California Public Utilities Commission (“CPUC”) are implemented. For example, Williams states that Amendment No. 72 should be approved only as an interim measure and that the Commission should direct the CAISO to develop long-term market solutions to eliminate incentives for underscheduling. Williams at 6-8. Similarly, SCE states that the Day-Ahead scheduling and resource notification requirements should sunset once MRTU and the CPUC’s Resource Adequacy program are in place. SCE at 6. See *also* AREM at 6, IEP at 3-4.

The CAISO agrees that, in the long-term, underscheduling concerns should be addressed through modifications to the existing California market design. Indeed, the CAISO’s September 22 filing letter stated that administrative rules such as those proposed in Amendment No. 72 can be eliminated upon implementation of the comprehensive MRTU market design. Specifically, MRTU will contain certain

mechanisms (e.g., the Residual Unit Commitment process) that will provide the appropriate incentives for Load-Serving Entities to forward schedule their forecast Demand. In addition, the CPUC's Resource Adequacy requirements and the ability to procure energy in the Day-Ahead Market representing transmission constraints will help ensure the feasibility of Schedules prior to real time, and will provide the CAISO with the ability to commit sufficient resources in such a way so as to ensure reliability entering the Real Time Market. The CAISO therefore intends to eliminate the administrative rules proposed in Amendment No. 72 upon implementation of MRTU and the related CPUC Resource Adequacy requirements.

### III. CONCLUSION

Wherefore, for the reasons discussed above, the CAISO respectfully requests that the Commission accept Amendment No. 72, with such clarifying modifications as the CAISO has committed to make in this Answer.

Respectfully submitted,

---

Sean A. Atkins  
Michael Kunselman  
Alston & Bird LLP  
601 Pennsylvania Avenue NW  
North Building, 10<sup>th</sup> Floor  
Washington, DC 20004  
Tel: (202) 756-3300  
Fax: (202) 654-4872

**/s/ Anthony J. Ivancovich**  
Charles F. Robinson  
General Counsel  
Anthony J. Ivancovich  
Associate General Counsel –  
Regulatory  
The California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
Tel: (916) 608-7135  
Fax: (916) 608-7296

Dated: October 28, 2005

## **ATTACHMENT 1**

Tariff changes made through Amendment 72 established several new reporting requirements on all Scheduling Coordinators. This notice provides a description of the format for submitting required data to the ISO.

Scheduling Coordinators should provide the information required by CAISO Tariff Section 2.2.12.3 in a standard electronic format (comma delimited or spreadsheet) composed of rows with the following fields or columns, as shown below. The SC\_ID, TRA\_DT, OPR\_HR, and UDC\_ID fields should be completed for the daily, preliminary weekly, and final weekly information submittals. The other fields should be completed as noted below.

This data should be submitted to [TBD]

<u>Column Label</u>	<u>Description</u>
SC_ID	Schedule Coordinator (SCID as listed on ISO Home Page).
TRA_DT	Trading Day (in DDMMYYYY format)
OPR_HR	Hour at the end of the applicable Settlement Period (1 to 24)
UDC_ID	UDC Service Area (UDC_ID as listed on ISO Home Page)
D_FC	Total Demand Forecast by UDC Service Area for which Scheduling Coordinator will schedule deliveries. This field should be initially completed for the daily submittal pursuant to Section 2.2.12.3.1 and also be included in the preliminary weekly and final weekly submittals.
D_DA	Total Demand scheduled on a Day-Ahead basis by Scheduling Coordinator for UDC Service Area. This field should be initially completed for the preliminary weekly submittal pursuant to Section 2.2.12.3.2 and also be included in the final weekly submittal.
D_EST	Total estimated Demand for SC for UDC Service Area based on SC's estimate of actual Demand in UDC Service Area after conclusion of Trading Day. This field should be initially completed for the preliminary weekly submittal pursuant to Section 2.2.12.3.2 and also be included in the final weekly submittal.
D_ACT	Total actual metered Demand for SC for UDC Service Area based on SC's Settlement Quality Meter Data. This field should be initially completed for the final weekly submittal pursuant to Section 2.2.12.3.3
Notes	Text filed for any notes or explanations of data in row that the SC believes may be appropriate.



October 28, 2005

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 Nos. ER05-1502-000**

Dear Secretary Salas:

Enclosed please find an electronic filing of a Motion to File Answer and Answer to Comments and Protests of The California Independent System Operator Corporation in the above-entitled document.

Thank you for your attention to this filing.

Respectfully submitted,

**/s/ Anthony J. Ivancovich**  
Anthony J. Ivancovich

Counsel for the California Independent  
System Operator Corporation

## CERTIFICATE OF SERVICE

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

Dated at Folsom, California, on this 28th day of October, 2005.

**/s/ Anthony J. Ivancovich**  
Anthony J. Ivancovich