

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

**California Independent System) Docket No. ER14-2372-000
Operator Corporation)**

**PETITION FOR LIMITED TARIFF WAIVER OF THE CALIFORNIA
INDEPENDENT SYSTEM OPERATOR CORPORATION**

The California Independent System Operator Corporation (“CAISO”)¹ respectfully requests a temporary suspension of the effectiveness, or limited waiver, of the tariff revisions accepted in this proceeding.² The CAISO requests waiver to permit the tariff revisions, which the Commission accepted to become effective as of December 1, 2014, to be implemented by December 31, 2014. The CAISO anticipates that it will be able to implement the tariff revisions by December 15 and commits to submit an informational filing in this proceeding seven days in advance of the implementation of the tariff revisions. The CAISO respectfully requests that the Commission set a comment date of November 21, 2014, in order to provide sufficient time for the Commission to issue an order before December 1, 2014.

Good cause exists for the Commission to grant this request because the waiver is necessary to accommodate the requests of market participants that the

¹ The CAISO submits this petition for waiver pursuant to Rule 207 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.207. Capitalized terms not otherwise defined herein have the meanings set forth in the CAISO tariff.

² See *California Independent System Operator Corp.*, 148 FERC ¶ 61,168 (2014) (“September 29 order”); *California Independent System Operator Corp.*, 149 FERC ¶ 61,010 (2014) (“October 2 order”).

implementation date be moved from December 1, which is immediately after the Thanksgiving Day holiday weekend, to a date later in December. Without such a waiver, it may be challenging for market participants to satisfy the requirements of the enhanced outage management system reflected in these tariff revisions. The CAISO and market participants also continue to perform market simulation to achieve the needed quality for the end-to-end system.

I. Background

On July 7, 2014, the CAISO filed revisions to its tariff to enhance the outage management process, change the timeline for scheduling coordinators to submit planned outages, and revamp the outage options available to scheduling coordinators for resource adequacy resources. The CAISO requested that the Commission accept the tariff revisions effective September 22, 2014. In the September 29 order, the Commission accepted the tariff revisions and the originally requested effective date.

On September 11, 2014, the CAISO filed a request to modify the effective date of the tariff revisions from September 22 to December 1, 2014. The CAISO explained that good cause existed to grant the request because it was necessary to accommodate the requests of market participants for additional time to modify their software and outage procedures, and train personnel, prior to the implementation of the enhanced outage management system. The Commission granted the CAISO's request in the October 2 order.

Market participants recently asked the CAISO to move the effective date of the tariff revisions from December 1, which is immediately after the

Thanksgiving Day holiday weekend, to a date later in December. The market participants stated that this modest change in the implementation date would make it more workable for them to satisfy the requirements of the enhanced outage management system reflected in these tariff revisions. In addition, the CAISO continues to improve the quality of the new system to ensure that the end-to-end system meets the quality expectations for this critical function. The addition of at least two weeks will provide the necessary time for important software improvements to be made. On November 12, 2014, the CAISO issued a market notice announcing that it planned to seek Commission approval to modify the effective date and targeted December 15, 2014, as the new date for implementation.

II. Request for Limited Tariff Waiver

Good cause exists for the Commission to grant a limited waiver to permit the tariff revisions the Commission accepted to become effective as of December 1, 2014, to be implemented on a date by December 31, 2014. As explained above, market participants recently requested that the CAISO move the implementation date of the tariff revisions from December 1 to a date later in December, in order to make it more workable for them to satisfy the requirements of the enhanced outage management system reflected in these tariff revisions. The CAISO commits to submit an informational filing seven days in advance of the implementation of the tariff revisions.

The Commission has previously granted requests for tariff waivers in situations where (1) the waiver is of limited scope; (2) a concrete problem

needed to be remedied; and (3) the waiver did not have undesirable consequences, such as harming third parties.³ This request meets all three conditions. The waiver is of limited scope because it will only result in a modest delay in the implementation of the enhanced outage management system. The waiver addresses a concrete problem that needs to be remedied because it will facilitate the ability of market participants to satisfy the requirements of the enhanced outage management system reflected in these tariff revisions. Finally, the waiver does not have undesirable consequences because the CAISO tariff provisions related to outage management that are in effect today will remain in effect until the tariff revisions can be implemented. The waiver will effectively continue the status quo for slightly longer than contemplated by the October 2 order while facilitating a smooth transition to the enhanced outage management system and allowing the CAISO to implement the tariff revisions as expeditiously as possible. Therefore, good cause exists to grant the CAISO's request for limited waiver of the tariff revisions.

³ See, e.g., *New York Independent System Operator, Inc.*, 146 FERC ¶ 61,061, at P 19 (2014); *PJM Interconnection, L.L.C.*, 146 FERC ¶ 61,041, at P 5 (2014); *ISO New England Inc.*, 134 FERC ¶ 61,182, at P 8 (2011); *California Independent System Operator Corp.*, 132 FERC ¶ 61,004, at P 10 (2010).

III. Conclusion

For the foregoing reasons, the Commission should find that good cause exists to grant a limited waiver to permit the tariff revisions the Commission accepted in this proceeding to become effective as of December 1, 2014, to be implemented on a date by December 31, 2014.

Respectfully submitted,

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Dated: November 17, 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 17th day of November, 2014.

/s/ Bradley R. Miliauskas
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