



California ISO

California Independent System Operator Corporation

November 2, 2023

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

**Re: California Independent System Operator Corporation
Errata Filing
Docket No. ER24-155-000**

Dear Secretary Bose:

On October 19, 2023, the California Independent System Operator Corporation (CAISO) submitted its filing in compliance with Order No. 895.¹ The CAISO's transmittal letter included typographical errors, which are corrected through the submission of this errata. A clean and marked version of the letter transmitting the CAISO's tariff revisions in compliance with Order No. 895 are included. The CAISO has served this filing on the same entities that were served the original filing.

¹ See California Independent System Operator Corporation submits tariff filing, Docket No. ER24-155 (Oct. 19, 2023); see also *Credit Related Information Sharing in Organized Wholesale Markets*, Order No. 895, 183 FERC ¶ 61,193 (2023).

The Honorable Kimberly D. Bose
November 2, 2023
Page 2

Please contact the undersigned if you have any questions regarding the foregoing.

Respectfully submitted,

/s/ Heather Curlee

Roger E. Collanton

General Counsel

Anthony Ivancovich

Deputy General Counsel

Andrew Ulmer

Assistant General Counsel

Heather Curlee

Senior Counsel

California Independent System

Operator Corporation

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Counsel for the California Independent System
Operator Corporation

Clean Version

Errata to the Compliance Filing – FERC Order No. 895

California Independent System Operator Corporation

November 2, 2023



California Independent
System Operator Corporation

October 19, 2023

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

**Re: California Independent System Operator Corporation
Docket No. ER24- ____-000**

**Tariff Amendment in Compliance with Order No. 895, Credit
Related Information Sharing in Organized Wholesale Markets**

Dear Secretary Bose:

The California Independent System Operator Corporation (CAISO)¹ submits this filing in compliance with the Commission's Order No. 895.² In Order No. 895, the Commission directed each individual regional transmission organization and independent system operator (RTO/ISO) to submit a compliance filing proposing tariff provisions that will permit the entity to share market participants' credit-related information with other RTOs/ISOs for the purpose of credit risk management and mitigation.³

In this filing, the CAISO proposes tariff revisions to support its implementation of the directives of Order No. 895 and requests the Commission find this compliance filing satisfies the requirements of Order No. 895.

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

² *Credit Related Information Sharing in Organized Wholesale Markets*, Order No. 895, 183 FERC ¶ 61,193 (2023).

³ Order No. 895 at P 19.

I. Background

On June 15, 2023, the Commission issued Order No. 895 in which it explained that the ability of RTOs/ISOs to share credit-related information amongst themselves will improve the ability to accurately assess market participants' credit exposure and risks.⁴ The Commission recognized that market participants and prospective market participants generally do not make credit-related information provided to RTOs/ISOs publicly available, and this limits the ability of RTOs/ISOs to share this confidential information even when such information could be relevant to credit risk or mitigation.⁵ The Commission determined that information sharing amongst the RTOs/ISOs will contribute to a reduction of mutualized default risk and minimization of the costs resulting from such defaults when they occur.⁶

The CAISO's credit risk management rules and practices balance the need for robust market participant and liquidity while seeking to minimize mutual default risk. Section 12 of the CAISO tariff sets forth the standards by which the CAISO evaluates creditworthiness of market participants and potential market participants. As the Commission explained in Order No. 895, managing credit risk requires access to adequate information about a market participants' financial standing, including access to information about a market participant's business and operational activities in other organized wholesale electric markets.⁷ Although the CAISO has access to confidential information provided by its own market participants, the CAISO has limited visibility into the activities of that market participant or its affiliates in another organized wholesale electric market.⁸

In Order No. 895, the Commission concluded that tariff provisions that limit an RTO/ISOs ability to access and use a market participant's credit-related information from another RTO/ISO posed an unjust and unreasonable barrier to credit risk management and mitigation by the RTOs/ISOs.⁹ To address this limitation, the Commission has revised its regulations to require each RTO/ISO have tariff provisions that permit it to share market participants' credit-related

⁴ Order No. 895 at P 2.

⁵ Order No. 895 at P 6.

⁶ Order No. 895 at P 15.

⁷ Order No. 895 at P 16.

⁸ *Id.*

⁹ Order No. 895 at P 18.

information with other RTOs/ISOs for the purpose of credit risk management and mitigation.¹⁰ The revised regulations require the CAISO to implement tariff provisions that allow the CAISO to share credit-related information with the other Commission-jurisdictional wholesale market operators as a means to enhance credit management responsibilities.¹¹

II. CAISO Tariff Provisions Relevant to Order No. 895

The CAISO tariff prescribes rules and guidelines to govern a market participant's submission of credit-related information and require the CAISO to afford confidential treatment to such information. Consistent with Order No. 895, the CAISO is proposing revisions to its tariff to enhance its ability to share with the other Commission-jurisdictional RTO/ISOs all credit-related information through revisions to Appendix A, Section 12, and Section 20 of the CAISO Tariff.

A. Defining Credit Related Information

Order No. 895 declines to limit the type of information which can be shared amongst the RTOs/ISOs, acknowledging that it is impossible to foresee every type of credit-related information that may be useful to share.¹² Consistent with the Commission's approach in other creditworthiness matters, Order No. 895 provides discretion to each RTO/ISO to determine the types of credit-related information to share with the other jurisdictional RTOs/ISOs.¹³

To effectuate the sharing and receipt of credit-related information consistent with Order No. 895, the CAISO is proposing to add a new defined term to Appendix A for "Credit Related Information." Similar to how the CAISO defined a Material Change in Financial Condition in compliance with Order No. 741,¹⁴ the CAISO proposes to incorporate into the definition a non-exhaustive list of examples of credit related information. In the revisions proposed herein, the CAISO proposes to define "Credit Related Information" in Appendix A as:

Credit risk management or mitigation information received from, or provided to, a market operator in accordance with 18 C.F.R. § 35.47(h)(1), to be used by the CAISO to the same extent and for

¹⁰ Order No. 895 at PP 19-21.

¹¹ *Id.*

¹² Order No. 895 at P 32.

¹³ See, e.g., Order No. 895 at P 32.

¹⁴ See, e.g., *Cal. Indep. Sys. Operator Corp.*, 140 FERC ¶ 61,097 (2012); see also Appendix A "Material Change in Financial Condition."

the same purpose as information collected from Market Participants pursuant to Section 12 and afforded confidential treatment by the CAISO as provided in Section 20. The types of Credit Related Information include, but are not limited to, the following:

- (a) lists of participants with positions in that market;
- (b) reports and metrics around risk and credit exposures;
- (c) disclosure that a market participant or affiliate has defaulted on any of its financial or contractual obligations, failed to pay invoices on a timely basis, or failed to meet a collateral call;
- (d) information regarding a market participant's or its affiliate's unresolved credit/collateral issues;
- (e) information indicating that a market participant or its affiliate has an increased risk of default, such as instances where a market participant or its affiliate has experienced a material adverse condition or material adverse change under a market operator's FERC-approved OATT or related agreement; and
- (f) any other information on a market participant or its affiliate that indicates a possible material adverse change in creditworthiness or financial status or an unreasonable credit risk.

This defined term recognizes that the CAISO cannot reasonably foresee every type of credit-related information that may be useful to share with another RTO/ISO and allows the CAISO to use its discretion in determining the kinds of credit-related information to share with the other RTOs/ISOs, within the bounds of the Commission's regulations.¹⁵ The CAISO respectfully requests that the Commission accept its proposed definition of Credit Related Information in compliance with the directive of Order No. 895.

B. Specifying the Use and Provision of Credit Related Information

Order No. 895 directs that an RTO/ISO should use credit-related information received from another RTO/ISO to the same extent and for the same purposes as that RTO/ISO may use credit-related information collected from its

¹⁵ See, e.g., Order No. 895 at P 32. The CAISO uses the term "market operator" in its proposed Appendix A, as the CAISO Tariff does not otherwise use a defined term for RTO/ISO. As provided in proposed tariff section 20.4, the CAISO may only share Credit Related Information if the Commission has approved the necessary agreements of the receiving market operator.

own market participants. The CAISO's creditworthiness standards, which govern the extent and use of credit-related information, are set forth in Section 12 of the CAISO tariff. Section 12 specifies the types of credit-related information the CAISO collects from its market participants and details how the CAISO uses information received from market participants, together with publicly available information, to assess, calculate, and review a market participant's obligations.¹⁶

In compliance with the directive of Order No. 895, requiring a specification as to the use of credit-related information, the CAISO proposes revisions to Section 12.1, which specifies the credit and minimum participation requirements for the CAISO markets.¹⁷ Specifically, the CAISO is proposing to revise Section 12.1(c) to expressly authorize the CAISO to request "Credit Related Information" that is needed to complete a review and verification that the prospective market participant satisfies the minimum participation requirements.¹⁸ In addition, the CAISO is proposing to revise Section 12.1(c) to expressly authorize the CAISO to select a market participant for review and verification based on identified risk factors, including risk factors revealed through "Credit Related Information" received from another market operator.¹⁹ In addition, the CAISO is proposing to revise Section 12.1.1 and Section 12.1.2 to expressly authorize the CAISO to review the unsecured credit limit for any market participant whenever received "Credit Related Information" could indicate a material change in financial condition,²⁰ and to authorize use of "Credit Related Information" when assessing a market participant's overall financial health and ability to meet its financial obligations.²¹ The CAISO respectfully requests that the Commission accept these proposed tariff changes as compliant with Order No. 895's directive to specify how an RTO/ISO will use credit-related information.²²

In compliance with the directive of Order No. 895, requiring a specification of the provision of Credit Related Information with other jurisdictional RTOs/ISOs, the CAISO proposes revisions to Section 20.4 of the CAISO tariff, governing how

¹⁶ See, e.g., existing tariff Section 12; *Cal. Indep. Sys. Operator Corp.*, 136 FERC ¶ 61,194 (2011); *Cal. Indep. Sys. Operator Corp.*, 138 FERC ¶ 61,181 (2012).

¹⁷ See existing tariff Section 12.1(a) ("The credit and minimum participation requirements in this section apply to . . . any transaction in a CAISO Market [and] in any CAISO auction of CRRs.").

¹⁸ See new tariff Section 12.1(c).

¹⁹ *Id.*

²⁰ See new tariff Section 12.1.1.

²¹ See new tariff Section 12.1.2.

²² Order No. 895 at PP 47-50.

the CAISO may share confidential information with other parties. Specifically, the CAISO has proposed to revise Section 20.4 to add subsection (c)(iii) to specify:

As provided in 18 C.F.R. § 35.47(h)(1), the CAISO may share Credit Related Information with another market operator if the receiving market operator will treat the Credit Related Information received from the CAISO as confidential under the terms set forth in the receiving market operator's FERC-approved tariff.

As drafted, the CAISO's proposed tariff provision is consistent with Order No. 895's requirement to share credit related information only where authorized by the Commission. In the event FERC determines that a non-jurisdictional operator has just and reasonable means of maintaining confidentiality, the CAISO would be permitted to share such information. Until such time, this provision limits the CAISO to sharing information only with other Commission jurisdictional RTOs/ISOs, as required by Order No. 895.²³ The CAISO respectfully requests that the Commission accept these proposed tariff changes as compliant with Order No. 895's directive to specify how an RTO/ISO will share credit-related information.²⁴

C. Affording Confidential Treatment to Credit Related Information Received from Other RTOs/ISOs

Order No. 895 instructs each RTO/ISO that receives credit-related information from another RTO/ISO to revise its tariff to require that such information is kept confidential.²⁵ As the Commission explained, this requirement ensures that all credit-related information shared by RTOs/ISOs will be safeguarded by the receiving RTO/ISO in accordance with its FERC-approved tariff.²⁶

To protect credit-related information received by the CAISO from another RTO/ISO, the CAISO is proposing revisions to both Section 12 and 20 of its tariff. First, Section 12.1(d) of the CAISO tariff provides that the CAISO will treat "any documentation" provided in compliance with Section 12 as confidential.²⁷ The

²³ Order No. 895 at P 83.

²⁴ Order No. 895 at PP 47-50.

²⁵ Order No. 895 at PP 67-71.

²⁶ Order No. 895 at PP 67-69.

²⁷ See existing tariff Section 12.1(d).

CAISO has proposed to add language to specify that any Credit Related Information received from another RTO/ISO shall be treated as confidential.²⁸ Additionally, the CAISO is proposing to revise Section 20.4 to expressly state that Credit Related Information will be treated as confidential information.²⁹ Finally, the CAISO has proposed revisions to Section 20.4 to ensure an entity whose information as shared with CAISO has sufficient redress, as required by the Commission.³⁰ The CAISO respectfully requests that the Commission accept these proposed tariff changes as compliant with Order No. 895's directive to specify the confidential treatment the receiving RTO/ISO will afford to credit related information.³¹

III. Effective Date

The CAISO respectfully requests the Commission accept its tariff revisions, effective August 21, 2023, contemporaneous with Order No. 895.³²

IV. Communications

Correspondence and other communications regarding this filing should be directed to:

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California Independent System
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²⁸ See new tariff Section 12.1(d).

²⁹ See new tariff Section 20.4(c)(iii) (providing that the CAISO will treat any Credit Related Information as confidential in accordance with the confidentiality protections in Section 20); see *also* existing tariff Section 20.4(b) (providing for disclosure procedures for all "information that is otherwise required to be maintained in confidence pursuant to this Section 20," a category which includes Credit Related Information).

³⁰ See Order No. 895 at P 71.

³¹ Order No. 895 at PP 67-71.

³² To the extent necessary, the CAISO respectfully requests the Commission waive the prior notice and filing requirement as the Commission's regulations outlining the means and methods for sharing credit-related information amongst the RTOs/ISOs became effective no later than sixty days after publication of the rule and good cause exists to waive such period, making the CAISO's tariff revisions effective contemporaneous with the effectiveness of Order No. 895.

V. Service

The CAISO has served copies of this filing on the California Public Utilities Commission, the California Energy Commission, and all parties with scheduling coordinator agreements under the CAISO tariff. In addition, the CAISO has posted a copy of the filing on the CAISO website.

VI. Contents of filing

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

- | | |
|--------------|---|
| Attachment A | Clean CAISO tariff sheets incorporating this tariff amendment |
| Attachment B | Red-lined document showing the revisions in this tariff amendment |

VII. Conclusion

For the reasons set forth in this filing, the CAISO respectfully requests the Commission issue an order accepting the proposed tariff revisions as compliant with Order No. 895.

Respectfully submitted,

/s/ Heather Curlee

Roger E. Collanton
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Marked Version

Errata to the Compliance Filing – FERC Order No. 895

California Independent System Operator Corporation

November 2, 2023



California Independent
System Operator Corporation

October 19, 2023

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

**Re: California Independent System Operator Corporation
Docket No. ER24- ____-000**

**Tariff Amendment in Compliance with Order No. 895, Credit
Related Information Sharing in Organized Wholesale Markets**

Dear Secretary Bose:

The California Independent System Operator Corporation (CAISO)¹ submits this filing in compliance with the Commission's Order No. 895.² In Order No. 895, the Commission directed each individual regional transmission organization and independent system operator (RTO/ISO) to submit a compliance filing proposing tariff provisions that will permit the entity to share market participants' credit-related information with other RTOs/ISOs for the purpose of credit risk management and mitigation.³

In this filing, the CAISO proposes tariff revisions to support its implementation of the directives of Order No. 895 and requests the Commission find this compliance filing satisfies the requirements of Order No. 895.

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

² *Credit Related Information Sharing in Organized Wholesale Markets*, Order No. 895, 183 FERC ¶ 61,193 (2023).

³ Order No. 895 at P 19.

I. Background

On June 15, 2023, the Commission issued Order No. 895 in which it explained that the ability of RTOs/ISOs to share credit-related information amongst themselves will improve the ability to accurately assess market participants' credit exposure and risks.⁴ The Commission recognized that market participants and prospective market participants generally do not make credit-related information provided to RTOs/ISOs publicly available, and this limits the ability of RTOs/ISOs to share this confidential information even when such information could be relevant to credit risk or mitigation.⁵ The Commission determined that information sharing amongst the RTOs/ISOs will contribute to a reduction of mutualized default risk and minimization of the costs resulting from such defaults when they occur.⁶

The CAISO's credit risk management rules and practices balance the need for robust market participant and liquidity while seeking to minimize mutual default risk. Section 12 of the CAISO tariff sets forth the standards by which the CAISO evaluates creditworthiness of market participants and potential market participants. As the Commission explained in Order No. 895, managing credit risk requires access to adequate information about a market participants' financial standing, including access to information about a market participant's business and operational activities in other organized wholesale electric markets.⁷ Although the CAISO has access to confidential information provided by its own market participants, the CAISO has limited visibility into the activities of that market participant or its affiliates in another organized wholesale electric market.⁸

In Order No. 895, the Commission concluded that tariff provisions that limit an RTO/ISOs ability to access and use a market participant's credit-related information from another RTO/ISO posed an unjust and unreasonable barrier to credit risk management and mitigation by the RTOs/ISOs.⁹ To address this limitation, the Commission has revised its regulations to require each RTO/ISO have tariff provisions that permit it to share market participants' credit-related

⁴ Order No. 895 at P 2.

⁵ Order No. 895 at P 6.

⁶ Order No. 895 at P 15.

⁷ Order No. 895 at P 16.

⁸ *Id.*

⁹ Order No. 895 at P 18.

information with other RTOs/ISOs for the purpose of credit risk management and mitigation.¹⁰ The revised regulations require the CAISO to implement tariff provisions that allow the CAISO to share credit-related information with the other Commission-jurisdictional wholesale market operators as a means to enhance credit management responsibilities.¹¹

II. CAISO Tariff Provisions Relevant to Order No. 895

The CAISO tariff prescribes rules and guidelines to govern a market participant's submission of credit-related information and require the CAISO to afford confidential treatment to such information. Consistent with Order No. 895, the CAISO is proposing revisions to its tariff to enhance its ability to share with the other Commission-jurisdictional RTO/ISOs all credit-related information through revisions to Appendix A, Section 12, and Section 20 of the CAISO Tariff.

A. Defining Credit Related Information

Order No. 895 declines to limit the type of information which can be shared amongst the RTOs/ISOs, acknowledging that it is impossible to foresee every type of credit-related information that may be useful to share.¹² Consistent with the Commission's approach in other creditworthiness matters, Order No. 895 provides discretion to each RTO/ISO to determine the types of credit-related information to share with the other jurisdictional RTOs/ISOs.¹³

To effectuate the sharing and receipt of credit-related information consistent with Order No. 895, the CAISO is proposing to add a new defined term to Appendix A for "Credit Related Information." Similar to how the CAISO defined a Material Change in Financial Condition in compliance with Order No. 741,¹⁴ the CAISO proposes to incorporate into the definition a non-exhaustive list of examples of credit related information. In the revisions proposed herein, the CAISO proposes to define "Credit Related Information" in Appendix A as:

Credit risk management or mitigation information received from, or provided to, a market operator in accordance with 18 C.F.R. § 35.47(h)(1), to be used by the CAISO to the same extent and for

¹⁰ Order No. 895 at PP 19-21.

¹¹ *Id.*

¹² Order No. 895 at P 32.

¹³ See, e.g., Order No. 895 at P 32.

¹⁴ See, e.g., *Cal. Indep. Sys. Operator Corp.*, 140 FERC ¶ 61,097 (2012); see also Appendix A "Material Change in Financial Condition."

the same purpose as information collected from Market Participants pursuant to Section 12 and afforded confidential treatment by the CAISO as provided in Section 20. The types of Credit Related Information include, but are not limited to, the following:

- (a) lists of participants with positions in that market;
- (b) reports and metrics around risk and credit exposures;
- (c) disclosure that a market participant or affiliate has defaulted on any of its financial or contractual obligations, failed to pay invoices on a timely basis, or failed to meet a collateral call;
- (d) information regarding a market participant's or its affiliate's unresolved credit/collateral issues;
- (e) information indicating that a market participant or its affiliate has an increased risk of default, such as instances where a market participant or its affiliate has experienced a material adverse condition or material adverse change under a market operator's FERC-approved OATT or related agreement; and
- (f) any other information on a market participant or its affiliate that indicates a possible material adverse change in creditworthiness or financial status or an unreasonable credit risk.

This defined term recognizes that the CAISO cannot reasonably foresee every type of credit-related information that may be useful to share with another RTO/ISO and allows the CAISO to use its discretion in determining the kinds of credit-related information to share with the other RTOs/ISOs, within the bounds of the Commission's regulations.¹⁵ The CAISO respectfully requests that the Commission accept its proposed definition of Credit Related Information in compliance with the directive of Order No. 895.

B. Specifying the Use and Provision of Credit Related Information

Order No. 895 directs that an RTO/ISO should use credit-related information received from another RTO/ISO to the same extent and for the same

¹⁵ See, e.g., Order No. 895 at P 32. The CAISO uses the term "market operator" in its proposed Appendix A, as the CAISO Tariff does not otherwise use a defined term for RTO/ISO. As provided in proposed tariff section 20.43, the CAISO may only share Credit Related Information if the Commission has approved the necessary agreements of the receiving market operator.

purposes as that RTO/ISO may use credit-related information collected from its own market participants. The CAISO's creditworthiness standards, which govern the extent and use of credit-related information, are set forth in Section 12 of the CAISO tariff. Section 12 specifies the types of credit-related information the CAISO collects from its market participants and details how the CAISO uses information received from market participants, together with publicly available information, to assess, calculate, and review a market participant's obligations.¹⁶

In compliance with the directive of Order No. 895, requiring a specification as to the use of credit-related information, the CAISO proposes revisions to Section 12.1, which specifies the credit and minimum participation requirements for the CAISO markets.¹⁷ Specifically, the CAISO is proposing to revise Section 12.1(c) to expressly authorize the CAISO to request "Credit Related Information" that is needed to complete a review and verification that the prospective market participant satisfies the minimum participation requirements.¹⁸ In addition, the CAISO is proposing to revise Section 12.1(c) to expressly authorize the CAISO to select a market participant for review and verification based on identified risk factors, including risk factors revealed through "Credit Related Information" received from another market operator.¹⁹ In addition, the CAISO is proposing to revise Section 12.1.1 and Section 12.1.2 to expressly authorize the CAISO to review the unsecured credit limit for any market participant whenever received "Credit Related Information" could indicate a material change in financial condition,²⁰ and to authorize use of "Credit Related Information" when assessing a market participant's overall financial health and ability to meet its financial obligations.²¹ The CAISO respectfully requests that the Commission accept these proposed tariff changes as compliant with Order No. 895's directive to specify how an RTO/ISO will use credit-related information.²²

In compliance with the directive of Order No. 895, requiring a specification of the provision of Credit Related Information with other jurisdictional RTOs/ISOs, the CAISO proposes revisions to Section 20.3-4 of the CAISO tariff, governing

¹⁶ See, e.g., existing tariff Section 12; *Cal. Indep. Sys. Operator Corp.*, 136 FERC ¶ 61,194 (2011); *Cal. Indep. Sys. Operator Corp.*, 138 FERC ¶ 61,181 (2012).

¹⁷ See existing tariff Section 12.1(a) ("The credit and minimum participation requirements in this section apply to . . . any transaction in a CAISO Market [and] in any CAISO auction of CRRs.").

¹⁸ See new tariff Section 12.1(c).

¹⁹ *Id.*

²⁰ See new tariff Section 12.1.1.

²¹ See new tariff Section 12.1.2.

²² Order No. 895 at PP 47-50.

how the CAISO may share confidential information with other parties. Specifically, the CAISO has proposed to revise Section 20.3-4 to add subsection (bc)(iii) to specify:

As provided in 18 C.F.R. § 35.47(h)(1), the CAISO may share Credit Related Information with another market operator ~~may be shared by the CAISO as provided in 18 C.F.R. § 35.47(h)(1)~~ if the receiving market operator ~~has agreed to will~~ treat the Credit Related Information received from the CAISO as confidential under the terms set forth in the receiving market operator's FERC-approved tariff.

As drafted, the CAISO's proposed tariff provision is consistent with Order No. 895's requirement to share credit related information only where authorized by the Commission. In the event FERC determines that a non-jurisdictional operator has just and reasonable means of maintaining confidentiality, the CAISO would be permitted to share such information. Until such time, this provision limits the CAISO to sharing information only with other Commission jurisdictional RTOs/ISOs, as required by Order No. 895.²³ The CAISO respectfully requests that the Commission accept these proposed tariff changes as compliant with Order No. 895's directive to specify how an RTO/ISO will share credit-related information.²⁴

C. Affording Confidential Treatment to Credit Related Information Received from Other RTOs/ISOs

Order No. 895 instructs each RTO/ISO that receives credit-related information from another RTO/ISO to revise its tariff to require that such information is kept confidential.²⁵ As the Commission explained, this requirement ensures that all credit-related information shared by RTOs/ISOs will be safeguarded by the receiving RTO/ISO in accordance with its FERC-approved tariff.²⁶

To protect credit-related information received by the CAISO from another RTO/ISO, the CAISO is proposing revisions to both Section 12 and 20 of its tariff.

²³ Order No. 895 at P 83.

²⁴ Order No. 895 at PP 47-50.

²⁵ Order No. 895 at PP 67-71.

²⁶ Order No. 895 at PP 67-69.

First, Section 12.1(d) of the CAISO tariff provides that the CAISO will treat “any documentation” provided in compliance with Section 12 as confidential.²⁷ The CAISO has proposed to add language to specify that any Credit Related Information received from another RTO/ISO shall be treated as confidential.²⁸ Additionally, the CAISO is proposing to revise Section ~~20.4 20.1 and 20.2~~ to expressly state that Credit Related Information will be treated as confidential information.²⁹ Finally, the CAISO has proposed revisions to Section 20.4 to ensure an entity whose information as shared with CAISO has sufficient redress, as required by the Commission.³⁰ The CAISO respectfully requests that the Commission accept these proposed tariff changes as compliant with Order No. 895’s directive to specify the confidential treatment the receiving RTO/ISO will afford to credit related information.³¹

III. Effective Date

The CAISO respectfully requests the Commission accept its tariff revisions, effective August 21, 2023, contemporaneous with Order No. 895.³²

IV. Communications

Correspondence and other communications regarding this filing should be directed to:

Heather Curlee
Senior Counsel
California Independent System

²⁷ See existing tariff Section 12.1(d).

²⁸ See new tariff Section 12.1(d).

²⁹ See new tariff Section ~~20.120.4(c)(iii)~~ (providing that the CAISO~~“... and~~ will treat any Credit Related Information as confidential in accordance with the confidentiality protections in Section 20); see also existing tariff Section 20.4(b) (providing for disclosure procedures for all “information that is otherwise required to be maintained in confidence pursuant to this Section 20,” a category which includes Credit Related Information).; ~~new tariff Section 20.2(f)(vi) (including Credit Related Information to the extent such information is received through the transmission planning process).~~

³⁰ See Order No. 895 at P 71.

³¹ Order No. 895 at PP 67-71.

³² To the extent necessary, the CAISO respectfully requests the Commission waive the prior notice and filing requirement as the Commission’s regulations outlining the means and methods for sharing credit-related information amongst the RTOs/ISOs became effective no later than sixty days after publication of the rule and good cause exists to waive such period, making the CAISO’s tariff revisions effective contemporaneous with the effectiveness of Order No. 895.

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V. Service

The CAISO has served copies of this filing on the California Public Utilities Commission, the California Energy Commission, and all parties with scheduling coordinator agreements under the CAISO tariff. In addition, the CAISO has posted a copy of the filing on the CAISO website.

VI. Contents of filing

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

Attachment A	Clean CAISO tariff sheets incorporating this tariff amendment
Attachment B	Red-lined document showing the revisions in this tariff amendment

VII. Conclusion

For the reasons set forth in this filing, the CAISO respectfully requests the Commission issue an order accepting the proposed tariff revisions as compliant with Order No. 895.

Respectfully submitted,

/s/ Heather Curlee

Roger E. Collanton
General Counsel
Anthony Ivancovich
Deputy General Counsel
Andrew Ulmer
Assistant General Counsel
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hcurlee@caiso.com

*Counsel for the California Independent
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 2nd day of November, 2023.

/s/ Jacqueline Meredith

Jacqueline Meredith
An employee of the California ISO