

November 4, 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 of this letter 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,

Charles F. Robinson 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")¹

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.² 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

¹ Capitalized terms not otherwise defined herein are used in the sense given in the Master Definitions Supplement, Appendix A to the ISO Tariff.

² This market redesign effort, previously known as "MD02", has been renamed Market Redesign & Technology Upgrade ("MRTU")

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.³ 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. NOVEMBER 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.⁴ Section B includes a narrative regarding the budget along with an updated Budget Tracking and Status Report.⁵ Section C identifies the CAISO's key market redesign implementation issues including the previous month's

³ November 27, Order at P 9. ⁴ The major milestones for the MRTU projects are included in Attachment B.

⁵ The narrative includes only non-confidential information.

accomplishments, major milestones, upcoming activities, issue resolution with 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.

3

C. Key Issues

1. Resolution of Open Design and Policy Issues

The CAISO Board of Governors approved management's MRTU policy proposals on October 19, 2005. There were four major categories:

- Resource Adequacy / MRTU Integration issues the manner in which generation units identified as satisfying resource adequacy requirements will be made available to the CAISO markets;
- Transmission Rights issues how congestion revenue rights (CRRs) will be allocated so market participants can hedge the LMP-based congestion charges;
- Market Power Mitigation issues Competitive Path Assessment, Default Energy Bids and determination of a Bid Adder for frequently mitigated units; and
- 4. Spot Market Pricing and Settlements issues Trading Hubs, pricing and settlement for pre-dispatch inter-tie bids in the HASP, ancillary services ("AS") pricing in HASP and Real-time, Inter-SC trades of AS, settlement of Load Aggregation Points, Refunding Excess Revenues for Marginal Loss collection and detail on the Participating Intermittent Resources Program ("PIRP").

In addition, at the October 31 CAISO Board of Governors teleconference call meeting, management received Board approval to file the MRTU Tariff language later this year, and approval of two additional MRTU design issues –

composition of Existing Zone Generation Trading Hubs and MRTU issues relating to Metered Sub-Systems.

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: November 4, 2005

ATTACHMENT A

REDACTED

ATTACHMENT B

Major Projects

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

12/31/	/0	9/15/0	3/1/05	5/30/0	10/3 9/15		1/15/06 12/15/0
CONTRACT	DESIGN	DEVELOP	MENT	PRE FAT	FAT	SAT	

Scheduling Infrastructure Business Rules – SIBR

	8/15/0	3/1/0) 8/1/0	10/1/	v 12/1 ∕0 12/1		/15/0
CONTRACT	DESIGN		DEVELOPMENT	PRE FAT	FAT	SAT	

Congestion Revenue Rights - CRR								
	11/15	5/0	6/1/0) 9/15/	0 10/1	5/0 12/	1/0 1/1/0	6
	CONTRACT	DESIGN		DEVELOPMENT	PRE FAT	FAT	SAT	

Testing LEGEND

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 Dates: Revised schedule dates are shown above original schedule dates.

Attachment B: MRTU Update For November 2005 FERC Status Report

Major Projects

SETTLEMENTS, STAGE 1 - SaMC



SETTLEMENTS, STAGE 2 - SaMC

	CAISO and Vendor re-working schedule based on Stage 1 Delay							
06/29/0		7/1/0	9/1	/0 10/1	/0 12/1	/0 1/1	/0	
CONTRACT	DESIGN	DEVELOPME	NT	PRE FAT	FAT	SAT		

MARKET CLEARING - SaMC

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

Internally Developed Projects

LEGACY SYSTEMS 12/01/05 2/01/0 4/1/0 9/30/0 10/1/05 7/1/0 5 6 **IMPLEMENTATION FUNCTIONAL System** DESIGN DEVELOPMENT PLAN **TESTING TESTING MASTER FILE REDESIGN** 11/30/0 8/1/0 10/1/0 12/1/0 4/1/0 **IMPLEMENTATION System** DESIGN **FUNCTIONAL** DEVELOPMENT PLAN **TESTING TESTING**

POST TRANSACTION REPOSITORY - PTR

11	/30/0	3/1/0	1	1/1/0 12	2/1/0	1/1/0
IMPLEMENTATION PLAN	DESIGN	DEVELOPMENT		FUNCTIONAL TESTING	SYSTEM TESTING	

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 4th day of November 2005.

Sidney M. Davies Com Sidney Mannheim Davies