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

California Independent System	)	Docket Nos. ER09-556-002,
Operator Corporation	)	ER08-367-007,
	)	and ER06-615-053

## INFORMATIONAL REPORT OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION

The California Independent System Operator Corporation ("ISO") submits this informational report to confirm that the software modifications needed to put simplified ramping into effect are on schedule to be deployed by November 5, 2009, the effective date of the ISO tariff provisions to implement simplified ramping.<sup>1</sup>

# I. Background

On September 11, 2009, the ISO filed a motion in this proceeding ("September 11 Motion") to postpone, from October 1 to November 5, 2009, the effective date of the revisions to Sections 34.5(10), 34.15.1(c), and 34.15.5 of the ISO tariff concerning simplified ramping (collectively, "Simplified Ramping Tariff Provisions"). The ISO explained that this postponement was necessary because the software modifications needed to implement the Simplified Ramping Tariff Provisions were not complete and, therefore, not ready for testing and market simulation in time for implementation on October 1. The ISO also stated that, because there was still some uncertainty concerning the software deployment

<sup>&</sup>lt;sup>1</sup> The ISO submits this informational report pursuant to the letter order issued in this proceeding on October 6, 2009 ("October 6 Letter Order").

schedule, the ISO planned to file an informational report with the Commission on October 15, 2009, to confirm whether the software revisions needed to implement simplified ramping are on track for the proposed November 5 effective date. Further, the ISO stated that, following Commission approval of the November 5 effective date, the ISO would submit a filing with tariff sheets revised solely to reflect that modified effective date and to correct an inadvertent error on one of the previously accepted tariff sheets containing the Simplified Ramping Tariff Provisions.

In the October 6 Letter Order, the Commission accepted the September 11 Motion and noted that the ISO would make the October 15 informational filing.

#### II. Informational Filing

Based on the progress made to date in the testing and variance correction process for the simplified ramping software, the ISO continues to believe that the software will be ready to be deployed by November 5.<sup>2</sup> The ISO does not anticipate that any event will occur between now and November 5 that will prevent the deployment of the simplified ramping software on that date. Therefore, the ISO believes that November 5 remains an attainable implementation date for the Simplified Ramping Tariff Provisions. The ISO will promptly submit an appropriate filing to the Commission if, anytime between now and November 5, any event occurs that leads the ISO to believe that the

<sup>&</sup>lt;sup>2</sup> This progress is also reflected in market notices the ISO issued on September 25 and October 1, 2009, regarding simplified ramping market simulation. These market notices are available on the ISO's website at <a href="http://www.caiso.com/docs/2000/06/01/2000060115470223946.html">http://www.caiso.com/docs/2000/06/01/2000060115470223946.html</a>. The market notices state that simplified ramping will be implemented on November 6, 2009. This November 6 date is when simplified ramping is scheduled to be implemented for the real-time market. Simplified ramping is scheduled to be implemented for the day-ahead market on November 5.

simplified ramping software will not be ready to be deployed by November 5 and therefore that the Simplified Ramping Tariff Provisions cannot be implemented by that date.

Pursuant to this informational report, the September 11 Motion, and the October 6 Letter Order, the ISO plans to submit a filing with tariff sheets revised solely to reflect the November 5 effective date of the Simplified Ramping Tariff Provisions and to correct an inadvertent error on one of the previously accepted tariff sheets containing the Simplified Ramping Tariff Provisions.<sup>3</sup>

<sup>&</sup>lt;sup>3</sup> That ISO filing will include only clean tariff sheets. The filing will not include any blacklined tariff changes. As the ISO explained in the September 11 Motion (at footnote 11), the Commission has already accepted black-lined tariff changes related to the inadvertent error the ISO will correct, and the error only arose because the black-lined tariff changes accepted by the Commission were not all subsequently reflected in clean Tariff Sheet No. 639.

## III. Conclusion

As explained above, the software modifications needed to put simplified ramping into effect are on schedule to be deployed by November 5, 2009. Please contact the undersigned with any questions.

Respectfully submitted,

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Dated: October 15, 2009

# CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the captioned 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, D.C. this 15<sup>th</sup> day of October, 2009.

<u>/s/ Bradley R. Miliauskas</u> Bradley R. Miliauskas