



September 13, 2023

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

**Re: California Independent System Operator Corporation**

**Compliance Filing of Tariff Amendment to Adjust Shift Factor  
Threshold and Enhance Market Parameter Change Process**

**Docket No. ER23-2020-\_\_\_**

Dear Secretary Bose:

The California Independent System Operator Corporation (CAISO) submits this filing in compliance with the Federal Energy Regulatory Commission's Order on Tariff Revisions and Directing Compliance issued on August 24, 2023 in the above-captioned docket.<sup>1</sup> The CAISO requests that the Commission accept the proposed tariff revisions, effective September 13, 2023, as compliant with the August 24 Order.<sup>2</sup>

## **I. Background**

On May 31, 2023, the CAISO submitted a tariff amendment in this proceeding to (1) adjust the threshold it applies for considering the effectiveness of a resource in managing congestion, and (2) propose a new process to permit temporary changes

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<sup>1</sup> *Calif. Indep. Sys. Operator Corp.* 184 FERC ¶ 61,119 (2023) (August 24 Order). Capitalized terms not otherwise defined herein have the meaning set forth in the CAISO tariff, and references to specific sections, articles, and appendices are references to sections, articles, and appendices in the CAISO tariff.

<sup>2</sup> The CAISO has included an effective date of September 13, 2023 for the tariff records in this filing.

to parameter values the CAISO market uses to reflect relative scheduling priorities and constraints. The CAISO included redline changes to Sections 27.4.3.4 and 27.4.3.5, and proposed a new section 31.4.1. The CAISO requested an effective date no later than September 30, 2023, subject to the CAISO filing a notice with the Commission within 5 days of the actual effective date.

In the August 24 Order, the Commission accepted in part, subject to condition, and rejected in part the proposed tariff revisions. The Commission directed the CAISO to submit a compliance filing within 30 days of the date of the order making several specific changes to proposed section 31.4.1.<sup>3</sup> In this compliance filing, the CAISO submits the tariff revisions as directed in the August 24 order.

## **II. Materials Provided in this Compliance Filing**

In addition to this transmittal letter, this compliance filing includes:

Attachment A	Clean CAISO tariff sheets reflecting the tariff revisions described above
Attachment B	Red-line CAISO tariff sheets reflecting the tariff revisions described above

**III. Conclusion**

The CAISO requests that the Commission accept this compliance filing effective September 13, 2023.

Respectfully submitted,

**By: /s/ David Zlotlow**

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## 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 13th day of September, 2023.

*/s/ Jacqueline Meredith*

Jacqueline Meredith  
An employee of the California ISO

**Attachment A – Clean Tariff**  
**Compliance Filing – Market Parameter**  
**California Independent System Operator Corporation**  
**September 13, 2023**

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### **31.4.1 Temporary Changes to Scheduling Run Parameter Values**

If the CAISO determines it is necessary to modify the scheduling run parameter values in sections 31.4, 34.12.1, or 34.12.2 to address market solutions that do not align with scheduling priorities or avoid operational or reliability problems the resolution of which would otherwise require recurring operator intervention outside normal scheduling and market procedures, it may temporarily modify the value for a period up to ninety days. If circumstances reasonably allow, CAISO will consult with CAISO's Market Monitoring Unit before implementing such modification. In all circumstances, the CAISO will (i) consult with those entities as soon as reasonably possible after implementing a temporary modification, and (ii) notify Market Participants within one business day after the change of any temporary modification and explain the reasons for the change.

This section does not authorize the CAISO to change the scheduling run parameter values in a manner that changes the relative scheduling run priorities specified in sections 31.4, 34.12.1, and 34.12.2.

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**Attachment B – Marked Tariff**  
**Compliance Filing – Market Parameter**  
**California Independent System Operator Corporation**  
**September 13, 2023**

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### **31.4.1 Temporary Changes to Scheduling Run Parameter Values**

If the CAISO determines it is necessary to modify the scheduling run parameter values in sections 31.4, 34.12.1, or 34.12.2 to address market solutions that do not align with scheduling priorities or avoid operational or reliability problems the resolution of which would otherwise require recurring operator intervention outside normal scheduling and market procedures, it may temporarily modify the value for a period up to ninety days, ~~provided however CAISO will file such change with FERC under Section 205 of the Federal Power Act within thirty days of such modification.~~ If circumstances reasonably allow, CAISO will consult with ~~FERC and the~~ CAISO's Market Monitoring Unit before implementing such modification. In all circumstances, the CAISO will (i) consult with those entities as soon as reasonably possible after implementing a temporary modification, and (ii) notify Market Participants within one business day after the change of any temporary modification and explain the reasons for the change. This section does not authorize the CAISO to change the scheduling run parameter values in a manner that changes the relative scheduling run priorities specified in sections 31.4, 34.12.1, and 34.12.2.

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