

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

California Independent System) Docket No. ER15-2204-____
Operator Corporation)

**PETITION FOR LIMITED TARIFF WAIVER OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
TO MODIFY EFFECTIVE DATE**

The California Independent System Operator Corporation (“CAISO”) respectfully requests a temporary suspension of the effectiveness, or limited waiver, of the tariff revisions accepted in the order issued in this proceeding on September 14, 2015.¹ As requested by the CAISO in its July 14, 2015 tariff amendment filing, the September 14 order accepted the tariff revisions that the CAISO originally proposed to become effective September 15, 2015. The CAISO requested the September 15 effective date because it planned to implement the tariff revisions as part of its 2015 fall software release (“2015 fall release”), which was then scheduled for September 15. However, the 2015 fall release recently has been postponed from September 15 to October 27, 2015. Therefore, the CAISO now requests that the Commission suspend the effectiveness of the tariff revisions until October 27, 2015.

Good cause exists for the Commission to find that this petition satisfies its waiver criteria. The waiver is of limited scope in that it will apply for only six weeks. The waiver will also remedy the concrete problem that the tariff revisions

¹ *Cal. Indep. Sys. Operator Corp.*, 152 FERC ¶ 61,195 (2015) (“September 14 order”). The CAISO submits this petition for limited waiver pursuant to Rule 207 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.207.

cannot go into effect until the 2015 fall release is implemented. Further, the waiver will not have undesirable consequences, because it will maintain the status quo. For these reasons, the Commission should grant the petition.

I. Background

On July 14, 2015, the CAISO filed a tariff amendment in this proceeding to revise its validation process for self-schedules supported by existing transmission rights and transmission ownership rights. In that filing, the CAISO requested that the Commission accept the proposed tariff revisions effective as of September 15, 2015.² The CAISO requested this effective date because it planned to implement the tariff revisions as part of its 2015 fall release, which was then scheduled for September 15.

In yesterday's order, the Commission accepted the tariff revisions effective as of the requested September 15, 2015 date.³

The CAISO has moved the the implementation date of the 2015 fall release from September 15 to October 27, 2015.⁴ The primary reason for moving the implementation date was to allow the CAISO to address concerns

² Transmittal letter for tariff amendment at 7, Docket No. ER15-2204-000 (July 14, 2015).

³ See September 14 order at P 10.

⁴ The CAISO announced the change in the implementation date of the 2015 fall release in an August 25, 2015 market notice available at the following link: <https://www.aiso.com/Pages/documentsbygroup.aspx?GroupID=40869543-F2B8-410C-9B6B-E4B843DD86B5>. The CAISO did not file this petition for limited tariff waiver at that time, and instead waited until after the September 14 order was issued, because the CAISO believed it was appropriate to allow the Commission to rule on the substance of the tariff revisions as requested prior to updating the requested effective date. Contemporaneously with the filing of this petition, the CAISO is also filing a similar petition in Docket No. ER15-1875 to suspend the effectiveness of the tariff revisions accepted in that proceeding from September 15 to October 27, 2015.

raised by the Commission regarding the CAISO's pending Energy Imbalance Market year one enhancements that are also included in the 2015 fall release.⁵

II. Petition for Limited Tariff Waiver

Good cause exists for the Commission to grant a limited waiver to suspend the effectiveness of the tariff revisions accepted in the September 14 order until October 27, 2015. The Commission has previously granted requests for tariff waivers in situations where (1) the waiver is of limited scope; (2) a concrete problem needs to be remedied; and (3) the waiver did not have undesirable consequences, such as harming third parties.⁶ This waiver petition meets all three conditions.

The waiver is of limited scope in that it will apply for only six weeks, from September 15 to October 27, 2015. The waiver will also remedy the concrete problem that the tariff revisions cannot go into effect until the 2015 fall release is implemented, because the software needed to implement the tariff revisions accepted in this proceeding must be bundled with the other software enhancements to be included in the 2015 fall release. Further, the waiver will not have undesirable consequences because the CAISO tariff provisions regarding the validation process for self-schedules supported by existing transmission rights and transmission ownership rights that are in effect today will remain in effect until the tariff revisions can be implemented. This waiver will effectively

⁵ See CAISO deficiency letter response, Docket No. ER15-1919-002, at 2 (Aug. 21, 2015).

⁶ See, e.g., *N.Y. Indep. Sys. 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); *Cal. Indep. Sys. Operator Corp.*, 132 FERC ¶ 61,004, at P 10 (2010).

maintain the status quo for a modest period while 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.

III. Conclusion

For the foregoing reasons, the Commission should find that good cause exists to grant a limited waiver to suspend the effectiveness of the tariff revisions accepted in this proceeding, until October 27, 2015.

Respectfully submitted,

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Dated: September 15, 2015

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all of the parties listed in 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 15th day of September, 2015.

/s/ Bradley R. Miliauskas
Bradley R. Miliauskas