

April 28, 2000

The Honorable David P. Boergers
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Re: California Independent System Operator Corporation,
Docket No. ER00-1239-____**

Dear Secretary Boergers:

Enclosed for filing please find copies of tariff sheets for the California Independent System Operator Corporation ("ISO")¹ FERC Electric Tariff, submitted in compliance with the Commission's March 29, 2000 order in the above-referenced docket.

On January 27, 2000, the ISO filed Amendment No. 25 to the ISO Tariff in the above-referenced docket. Among other things, Amendment No. 25 modified the ISO Tariff to provide for the publication of individual bid data and for the clarification of the ISO's procedures with respect to the cancellation or rescheduling of planned transmission outages.

A number of parties submitted motions to intervene, comments, and protests concerning Amendment No. 25. On March 3, 2000, the ISO submitted its Answer to Motions to Intervene, Comments, and Protests ("Amendment No. 25 Answer"). On March 29, 2000, the Commission issued an order accepting Amendment No. 25 with certain modifications and directing the ISO to submit a compliance filing within 30 days of the issuance of the order. *California Independent System Operator Corporation*, 90 FERC ¶ 61,316 (2000) ("Amendment No. 25 Order"). The Commission directed the ISO to address the following subjects in its compliance filing:

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

- *Release of Bid Information.* In Amendment No. 25, the ISO proposed that it be authorized to publish data sets analyzed in conjunction with a published ISO or Market Surveillance Committee (“MSC”) report, with as little as a one-month lag, subject to the approval of the ISO Board if the publication of the data sets would violate the ISO’s proposed six-month lag policy. Transmittal Letter for Amendment No. 25 filing at 4. In the Amendment No. 25 Order, the Commission declined to approve the one-month lag proposal, and directed the ISO to file revised Tariff sheets eliminating this provision. Amendment No. 25 Order, 90 FERC at 62,047. The ISO now submits revisions to Section 20.3.4 of the Tariff to comply with this directive. Black-lined Tariff provisions showing these changes are included in Attachment B to this filing.
- *Maintenance Outage Scheduling.* In Amendment No. 25, the ISO also proposed that it be authorized to cancel a previously approved transmission outage to avoid “unduly significant market impacts.” Amendment No. 25 Order, 90 FERC at 62,051. The Commission approved the ISO’s proposal, with the following modifications.

First, the Commission required the ISO to define the term “unduly significant market impacts” in the Tariff, in order to “give all parties sufficient assurance as to the necessity for the cancellation of an approved maintenance outage.” Amendment No. 25 Order, 90 FERC at 62,051. The ISO now submits revisions to Section 2.3.3.6 the Tariff, as well as to Section 3.2.3 of the OCP, to comply with the Commission’s directive. Black-lined Tariff provisions showing these changes are included in Attachment B to this filing.

Second, the Commission required the ISO to modify the Tariff sheets proposed in Amendment No. 25 “to reflect the continued applicability of Sections 2.3.3.6.1 and 2.3.3.6.2,” which sections the ISO had proposed to eliminate. Amendment No. 25 Order, 90 FERC at 62,051. The ISO now submits revisions to Section 2.3.3.6 of the Tariff to comply with the Commission’s directive. Black-lined Tariff provisions showing these changes are included in Attachment B to this filing.

In the Amendment No. 25 Answer, the ISO also stated that, upon consideration of the Commission’s direction in its Order No. 2000 and the concerns of intervenors regarding the Amendment No. 25 filing, the ISO would agree that if a transmission outage is canceled to avoid unduly significant market impacts under the authority added by Amendment No. 25, or for reliability reasons, it would be reasonable that any direct, unavoidable, and demonstrated costs incurred by the Participating Transmission Owner in rescheduling the maintenance should be paid by the beneficiaries of that action, i.e., participants in the ISO’s markets during the period for which the outage has been scheduled. Amendment No. 25 Answer at 11-12. The ISO committed to propose, in the Amendment No. 25 compliance filing,

The Honorable David P. Boergers

April 28, 2000

Page 3

appropriate modifications to the ISO Tariff to implement this concept. *Id.* at 12. The Commission subsequently directed the ISO to file revised Tariff sheets to provide for compensation for costs incurred by Transmission Owners in rescheduling maintenance outages. Amendment No. 25 Order, 90 FERC at 62,051. The ISO now submits revisions to the Tariff, through the addition of Sections 2.3.3.6.3 and 2.3.3.6.4 to the Tariff, as well as through changes to Section 3.2.3 of the Outage Coordination Protocol ("OCP"), to comply with this directive. Black-lined Tariff provisions showing these changes are included in Attachment B to this filing.

Enclosed are revised Tariff sheets which incorporate the revisions described above (Attachment A), as well as the text in black-line format of the affected Tariff provisions identifying the changes made in this compliance filing (Attachment B). Also enclosed is a notice of filing suitable for publication in the Federal Register (Attachment C) and a computer disk containing the notice in WordPerfect format.

In addition, two extra copies of the filing are enclosed. Please date-stamp the extra copies with the time and date of filing and return them to the messenger. Thank you for your assistance in this matter.

Respectfully submitted,

Roger E. Smith
Senior Regulatory Counsel
The California Independent
System Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630
Tel: (916) 608-7135
Fax: (916) 351-4436

Kenneth G. Jaffe
Michael E. Ward
Bradley R. Miliauskas
Sean A. Atkins
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
Tel: (202) 424-7500
Fax: (202) 424-7643

Attorneys for the California Independent System Operator Corporation

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all parties on the official service list compiled by the Secretary in the above-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 28th day of April, 2000.

Sean A. Atkins