NERC/WECC Mandatory Reliability Standards Tariff Language Modifications and *Pro Forma* Agreement



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CAISO Compliance with Reliability Standards

- Since 1997, CAISO Tariff framework addresses compliance with WECC reliability standards and flow-through of penalties
- CAISO is in compliance with these standards
- Detailed standards form the basis for the reliability criteria in the CAISO corporate goals
- March 13, 2007 FERC Order 693 authorized NERC/WECC administration of 83 national reliability standards
- Mandatory and enforceable on June 4, 2007
- CAISO is responsible for compliance of 56 standards incorporating 547 requirements and 118 measures



Formed Technical and Legal Working Groups with Stakeholders

- CAISO invited wide Stakeholder participation in working groups
 - Hosted WECC conference
 - Established Transmission Operator working group
 - Established legal working group
- Participation
 - PG&E, SCE, SDGE and MWD are most affected
 - WAPA actively participated in Legal working group
 - EOB actively monitored groups
- Reviewed 31 Transmission Operator standards
 - Identifying overlapping responsibilities
 - Allocation responsibility for penalties



Outcome of working sessions

- Development of a pro forma Reliability Standards Agreement
 - Bi-lateral agreement between CAISO and each Transmission Operator
 - Facilitates the compliance audit
 - Basis for identifying non-compliant parties
 - Not required by NERC or FERC
 - Filing with FERC
- Clarification to current Tariff framework to accommodate provision in pro forma agreement
 - To the extent non-compliance can be determined, penalties assessed to that entity



Filing of the pro forma Reliability Standards Agreement

Filing of Tariff Language clarifications relating to reliability standards compliance



Needed actions are necessitated by mandatory reliability standards paradigm

Questions ?



