

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

**California Independent System) Docket No. ER14-2372-000
Operator Corporation)**

**CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
MOTION TO MODIFY EFFECTIVE DATE OF TARIFF AMENDMENT,
REQUEST FOR SHORTENED RESPONSE TIME,
AND REQUEST FOR LIMITED TARIFF WAIVER**

The California Independent System Operator Corporation (“CAISO”)¹ respectfully submits this motion to modify the effective date of the tariff revisions accepted by the Commission’s order in this proceeding.² The CAISO requests that the effective date of the tariff revisions be modified from September 22, 2014 to December 1, 2014. Good cause exists for the Commission to grant this request because it is necessary to accommodate the requests of market participants for additional time to modify their software and outage procedures, and train personnel, prior to the implementation of the outage management system. The CAISO also requests that any answer to this motion be accepted no later than five calendar days after this motion is filed and that the Commission grant this motion by September 19, 2014.

I. Background

On July 7, 2014, the CAISO filed tariff revisions necessary to deploy the new outage management system and address the fundamental changes and enhancements

¹ Capitalized terms not otherwise defined herein have the meanings set forth in CAISO Tariff, Appendix A.

² The CAISO files this motion pursuant to Rules 212 and 2008(a) of the Commission’s Rules of Practice and Procedure, 18 C.F.R. §§385.212, 385.2008(a)(2013).

to the outage management process that will result, which include (i) changing the manner and format of the outage information that scheduling coordinators for transmission facilities that are part of the CAISO controlled grid and scheduling coordinators for participating generators must submit and (ii) restructuring the maintenance and forced outage options available to scheduling coordinators for resource adequacy resources. The CAISO requested that the Commission issue an order no later than September 8, 2014 accepting the proposed amendments with an effective date of September 22, 2014. The CAISO requested that effective date in its transmittal letter to allow deployment of the outage management system with sufficient time to integrate the program into its downstream systems prior to the expected October 1, 2014 release date for the new functionality for the energy imbalance market (“EIM”) and proposed enhancements of the full network model.

On September 5, 2014, the Commission issued an order approving the tariff amendments filed in this matter.

II. Recent Changes to the Schedule for Implementing the Outage Management System

The CAISO has recently determined that it must modify the schedule for implementing the outage management system to process maintenance outages and forced outages of transmission facilities that are part of the CAISO controlled grid and participating generators within the CAISO balancing authority area. Affected market participants have advised the CAISO that they need additional time to modify their applications and outage procedures, and complete extensive training of personnel, for implementation of the outage management system. Many market participants are still preparing their systems to integrate with the new CAISO outage management system.

Completion of this effort is important because many market participants rely on system-to-system communication, where outages entered into their systems are automatically transmitted to the CAISO, in order to eliminate double entry of outages due to the volume of entries. In addition, some participants have also determined that the training effort required for field staff who work shift schedules will not be completed in the time remaining before September 22, 2014. In total, market participants will have nearly 2,000 users of the CAISO outage management system. The CAISO continues to provide development support and training on the new outage management system and processes to support a successful launch on December 1, 2014.

Modifying the effective date of the tariff revisions in this proceeding will not affect the implementation of the outage management system for use in the energy imbalance market on October 1, 2014. The CAISO has two major releases per year for new market and systems functionality. By scheduling two predictable and staged releases, one in the spring and one in the fall, the CAISO can support a larger volume of enhancements while minimizing both technical and financial impacts to the CAISO and its market participants. In preparation for the fall 2014 release on October 1, the CAISO is completing its final load and performance testing of the outage management system, which includes functional testing of the system to determine if the product meets the business and system requirements identified by the CAISO during the requirements and design phases, as well as how the software performs with the integration of downstream applications, including the CAISO's settlement system. Accordingly, the outage management system is ready to be deployed as part of the fall 2014 release, but will be limited to use by the scheduling coordinator for the EIM entity to submit notices of

transmission and generation outages effective on October 1, 2014. The scheduling coordinator for the EIM entity will submit those outage notices through the outage management system subject to tariff Section 29.9 and the business practice manual for the energy imbalance market. Deploying the outage management system for this purpose is not dependent on the effectiveness of the tariff provisions subject to this motion.

III. Motion for December 1, 2014 Effective Date for Tariff Revisions, Request for Shortened Response Time, and Request for Limited Tariff Waiver

Good cause exists for the Commission to modify the effective date of the tariff revisions accepted on September 5, 2014. In response to requests by market participants for a delay in the implementation of the outage management system for transmission facilities in the CAISO controlled grid and participating generators in order to allow those market participants additional time to complete readiness efforts, the CAISO moves that the Commission alter the effective date of the tariff revisions approved in this proceeding from September 22, 2014 to December 1, 2014.

The CAISO respectfully requests that the Commission accept any answer to this motion no later than five calendar days after this motion is filed.³ The CAISO does not propose any changes to the substantive tariff revisions themselves, but seeks only an extension of their effective date from September 22, 2014 to December 1, 2014. If the Commission determines that the filing of this motion triggers a new comment period as to the tariff revisions accepted on September 5, 2014, any new comments should be limited to the merits of the requested extension of the effective date.

The CAISO also respectfully requests that the Commission issue an order by

³ See 18 C.F.R. §§ 385.213(d)(1)(i).

September 19, 2014, that grants the CAISO's request to modify the effective date of the tariff revisions to December 1, 2014. To the extent the Commission is unable to grant this motion by that date, the CAISO additionally requests a limited waiver of the tariff revisions accepted in the Commission's order in this proceeding, from September 22, 2014 through the date of an order granting this motion.

The Commission has previously granted requests for tariff waivers in situations where: (1) the waiver is of limited scope; (2) a concrete problem needed to be remedied; and (3) the waiver did not have undesirable consequences, such as harming third parties.⁴ All three conditions would be met by this waiver request. The waiver is of limited scope because it would only last until the Commission rules on the CAISO motion regarding the effective date of the tariff language. The waiver would address the concrete problem of requiring scheduling coordinators for transmission facilities and resources to submit outage information in the manner and format required under the tariff provisions for the outage management system before the end-to-end integrated functionality of the market participants' and CAISO's systems is available, and market participants have completed training their personnel who will use the system. The waiver would also avoid potential compliance and settlement issues if scheduling coordinators for resource adequacy resources were required to request maintenance and forced outages under the revised outage options, which the existing system would not recognize and could treat as unavailable capacity subject to charges under the standard capacity product. The CAISO is unaware of how any party would be harmed if

⁴ See, e.g., *New York Independent System Operator, Inc.*, 146 FERC ¶ 61,061, at P 19 (2014); *PJM Interconnection, L.L.C.*, 141 FERC ¶ 61,103, at P 8 (2012); *ISO New England Inc.*, 134 FERC ¶ 61,182, at P 8 (2011); *California Independent System Operator Corp.*, 132 FERC ¶ 61,004, at P 10 (2010).

the Commission were to grant this waiver.

After the Commission grants this motion, the CAISO will make any necessary changes on compliance to the eTariff records for the tariff revisions to reflect their new December 1, 2014 effective date.

IV. Conclusion

For the foregoing reasons, the Commission should find that good cause exists to issue an order by September 19, 2014 that modifies the effective date of the tariff revisions accepted by the Commission's September 5, 2014 order in this proceeding from September 22, 2014 to December 1, 2014.

Additionally, the Commission should grant a limited waiver of the tariff revisions accepted by the September 5, 2014 order to the extent the Commission is unable to grant this motion by September 19, 2014.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all of the parties listed on 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 Folsom, California this 11th day of September, 2014.

/s/ Sarah Garcia
Sarah Garcia