



California Independent  
System Operator Corporation

August 20, 2012

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

**Re: California Independent System Operator Corporation  
Docket No. ER12-\_\_\_\_ - 000**

**Filing in Compliance with Commission Order No. 760**

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act, 16 U.S.C. § 824d, and Part 35 of the Federal Energy Regulatory Commission's (FERC or the Commission) regulations, 18 C.F.R. Part 35, and in compliance with Order No. 714 regarding electronic filing of tariff submittals,<sup>1</sup> the California Independent System Operator Corporation (ISO) hereby submits for filing the attached amendment to its Fifth Replacement FERC Electric Tariff. This filing is made in compliance with FERC Order No. 760.<sup>2</sup>

Through Order No. 760 the Commission amended its regulations to require each independent system operator and regional transmission organization to deliver to the Commission on an ongoing basis a broad array of market information. The Commission stated that having this market data provided on an ongoing basis would "facilitate the Commission's development and evaluation of its policies and . . . enhance Commission efforts to detect anti-competitive or manipulative behavior, or ineffective market rules, thereby helping to ensure just and reasonable rates."<sup>3</sup>

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<sup>1</sup> *Electronic Tariff Filings*, Order No. 714, FERC Stats. & Regs. ¶ 31,276 (2008).

<sup>2</sup> *Enhancement of Electricity Market Surveillance and Analysis Through Ongoing Electronic Delivery of Data From Regional Transmission Organizations and Independent Systems Operators*, Order No. 760, 139 FERC ¶ 61,053 (2012) (Order No. 760).

<sup>3</sup> Order No. 760 at P 1.

Order No. 760 also requires each independent system operator and regional transmission organization to amend “its open access transmission tariff to reflect the requirement for the ongoing electronic delivery of data.”<sup>4</sup> The instant filing is being made to comply with this requirement. Specifically, the ISO proposes to amend section 20.4(a) of the ISO tariff to state that the ISO “shall, consistent with 18 CFR § 35.28 (g)(4), electronically deliver to FERC, on an ongoing basis and in a form and manner consistent with the CAISO’s own collection of data and in a form and manner acceptable to FERC, data related to the CAISO Markets.”

The ISO respectfully requests that the tariff amendments contained in the instant filing be effective as of August 20, 2012. Order No. 760 requires that the first dataset be delivered to the Commission no later than 45 days after the effective date of the order.<sup>5</sup> As the effective date of Order No. 760 is July 6, 2012, the first dataset will be delivered on August 20, 2012. The ISO believes it is appropriate for the instant tariff amendment to be made effective contemporaneously with the first transmission of data. The ISO accordingly requests any and all waivers necessary to make the instant amendment effective August 20.

Communications regarding this filing should be addressed to the following individual. The individual identified with an asterisk is the person whose name should be placed on the official service list established by the Secretary with respect to this submittal:

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The ISO has served copies of this transmittal letter, and all attachments, on the California Public Utilities Commission and the California Energy Commission, and all parties with effective Scheduling Coordinator Service Agreements under the ISO tariff. In addition, the ISO is posting this transmittal letter and all attachments on the ISO website.

The following documents, in addition to this transmittal letter, support the instant filing:

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<sup>4</sup> *Id.* at P 57.

<sup>5</sup> *Id.* at P 69.

**Attachment A**      Revised ISO Tariff Sheets – Clean

**Attachment B**      Revised ISO Tariff Sheets – Blackline

The ISO respectfully requests that the Commission approve this tariff revision as complying with the requirements of Order No. 760. Please contact the undersigned if you have any questions concerning this matter.

Respectfully submitted,

**By: /s/ David S. Zlotlow**

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Attorneys for the California Independent  
System Operator Corporation

Dated: August 20, 2012

**California Independent System Operator Corporation**

**Fifth Replacement FERC Electric Tariff**

**Attachment A - Clean Tariff**

**Order 760 Compliance Filing**

**August 20, 2012**

## **20.4 Disclosure**

Notwithstanding anything in this Section 20 to the contrary,

- (a) The CAISO: (i) shall publish individual bids ninety (90) days after the Trading Day with respect to which the bid was submitted and in a manner that does not reveal the specific resource or the name of the Scheduling Coordinator submitting the bid, but that allows the bidding behavior of individual, unidentified resources and Scheduling Coordinators to be tracked over time; (ii) may publish data sets analyzed in any public report issued by the CAISO or by the MSC, provided that such data sets shall be published no sooner than six (6) months after the latest Trading Day to which data in the data set apply, and in a manner that does not reveal any specific resource or the name of any Scheduling Coordinator submitting bids included in such data sets; and (iii) shall, consistent with 18 CFR § 35.28 (g)(4), electronically deliver to FERC, on an ongoing basis and in a form and manner consistent with the CAISO's own collection of data and in a form and manner acceptable to FERC, data related to the CAISO Markets.

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**California Independent System Operator Corporation**

**Fifth Replacement FERC Electric Tariff**

**Attachment B - Marked Tariff**

**Order 760 Compliance Filing**

**August 20, 2012**

## 20.4 Disclosure

Notwithstanding anything in this Section 20 to the contrary,

- (a) The CAISO: (i) shall publish individual bids ninety (90) days after the Trading Day with respect to which the bid was submitted and in a manner that does not reveal the specific resource or the name of the Scheduling Coordinator submitting the bid, but that allows the bidding behavior of individual, unidentified resources and Scheduling Coordinators to be tracked over time; ~~and~~ (ii) may publish data sets analyzed in any public report issued by the CAISO or by the MSC, provided that such data sets shall be published no sooner than six (6) months after the latest Trading Day to which data in the data set apply, and in a manner that does not reveal any specific resource or the name of any Scheduling Coordinator submitting bids included in such data sets; and (iii) shall, consistent with 18 CFR § 35.28 (g)(4), electronically deliver to FERC, on an ongoing basis and in a form and manner consistent with the CAISO's own collection of data and in a form and manner acceptable to FERC, data related to the CAISO Markets.