

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

**California Independent System            )       Docket No. OA09-17-000  
Operator Corporation                    )**

**ANSWER OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION  
TO MOTIONS TO INTERVENE AND COMMENTS**

The California Independent System Operator Corporation (“CAISO”) submits this answer<sup>1</sup> to the motions to intervene and comments filed in this proceeding in response to the CAISO’s January 16, 2009 filing to revise the CAISO’s Market Redesign and Technology Upgrade Tariff (“MRTU Tariff”),<sup>2</sup> Appendix L, Methodology to Assess Available Transfer Capability (“Appendix L”), in compliance the requirements of Order No. 890<sup>3</sup> and the Commission’s May 16, 2008 Order Accepting Compliance Filing As Modified.<sup>4</sup>

The CAISO does not oppose the intervention in this matter requested by the California Department of Water Resources State Water Project, the Transmission Agency of Northern California, Modesto Irrigation District, the City of Santa Clara, M-S-R Public Power Agency, Metropolitan Water District of Southern California or Powerex Corp. (“Powerex”).

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<sup>1</sup> The CAISO submits this answer pursuant to Rules 213 and 214 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. §§ 385.213 and 385.214 (2007).

<sup>2</sup> Capitalized terms not otherwise defined have the same meaning set forth in the MRTU Tariff on file with the Commission.

<sup>3</sup> *Preventing Undue Discrimination and Preference in Transmission Service*, Order No. 890, 72 Fed. Reg. 12,266 (March 15, 2007), FERC Stats. & Regs. ¶ 31,241 (2007), *order on reh’g*, Order No. 890-A, 73 Fed. Reg. 2984 (January 16, 2008, FERC Stats. & Regs. ¶ 31,261 (2007), *order on reh’g*, Order No. 890-B, 123 FERC ¶ 61,299 (2008) .

<sup>4</sup> *California Independent System Operator Corporation*, 123 FERC ¶ 61,180 (2008)(“May 16 Order”).

However, the CAISO does disagree with Powerex's claim that Appendix L should be revised to include two additional items of information -- a process flow diagram and link to mathematical algorithms posted on the CAISO's website. Powerex has over looked the provisions in Appendix L that already contain this information.<sup>5</sup>

As required by Order No. 890, the process flow diagram is provided in the CAISO's MRTU Tariff Appendix L, Section L.3, entitled ATC Process Flowchart. Section L.3 was included in the CAISO's initial filing of MRTU Tariff Appendix L, which was approved by the Commission in the May 16 Order and was not revised in the filing in this matter.

The May 16 Order also required revisions to Appendix L to add a description of the specific mathematical algorithms used by the CAISO to calculate ATC for its scheduling, operating, and planning horizons, and to provide a link to the location of the CAISO Website where the actual algorithms are posted.<sup>6</sup> For the currently effective tariff, the CAISO met the requirements of the May 16 Order by revising Appendix L, Section L2, to add a narrative description of the ATC algorithms and to include the mathematical algorithms. By Order dated February 9, 2009 in Docket Nos. OA08-12-001, *et al.*, the Commission accepted these revisions (and unrelated modifications to Appendix L) as being in compliance with the Commission's directives in Order No. 890 and the May 16 Order.<sup>7</sup> For the MRTU Tariff, the CAISO in this matter proposes similar

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<sup>5</sup> A copy of the full text of MRTU Tariff Appendix L is attached to this answer for reference.

<sup>6</sup> *Id.* at P 49.

<sup>7</sup> *California Independent System Operator Corp.*, 126 FERC ¶ 61,099 (2009) ("February 9 Order").

revisions. The CAISO's filing revises MRTU Tariff Appendix L, Section L2 to add a narrative description of the ATC algorithms that will be used following the implementation of MRTU and to include the mathematical algorithms. The CAISO submits that these revisions fully satisfy the requirements of the May 16 Order and should be approved by the Commission, consistent with the February 9 Order.

For the foregoing reasons, the CAISO requests that the Commission decline to accept the modifications suggested by Powerex.

Respectfully submitted,

**/s/ Beth Ann Burns**

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Dated: February 20, 2009

## CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the entities that are described in that document as receiving service, 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 20th day of February, 2009.

*/s/ Jane Ostapovich*  
Jane Ostapovich

## CAISO TARIFF APPENDIX L