

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

**California Independent System)
Operator Corporation) Docket No. ER09-____-____**

**PETITION OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
FOR WAIVER OF OPEN ACCESS SAME TIME
INFORMATION SYSTEM REQUIREMENTS**

The California Independent System Operator Corporation (“CAISO”) respectfully submits this Petition pursuant Rule 207 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.207 (2007), and the Commission’s Order in *California Independent System Operator Corporation*, 117 FERC ¶ 61,196 (2006), for a waiver of certain Open Access Same-Time Information System (“OASIS”) standards and communication protocols, 18 C.F.R. Part 37 (2007), and OASIS business practice standards, 18 C.F.R. Part 38 (2007), that will be inapplicable to and/or incompatible with the CAISO’s operations under the structure of the Market Redesign and Technology Upgrade (“MRTU”). The CAISO requests that waiver be approved by the Commission, without modification, suspension, or hearing and made effective on the effective date of MRTU implementation (which is targeted for March 31, 2009).

I. BACKGROUND

In Order No. 889, the Commission added Part 37 to its regulations to establish OASIS standards and communication protocols.¹ The OASIS rules require each public

¹ Order No. 889, *Open Access Same-Time Information System (formerly Real-Time Information Networks) and Standards of Conduct*, 75 FERC ¶ 61,078 (1996). See also Order No. 889-A, 78 FERC ¶ 61,221 (1997); Order No. 889-B, 81 FERC ¶ 61,253 (1997); Order No 890, *Preventing Undue Discrimination and Preference in Transmission Service*, 72 Fed. Reg. 12,266 (March 15, 2007), FERC

utility that owns, controls, or operates facilities used for the transmission of electric energy in interstate commerce to create or participate in an OASIS that will provide open access transmission customers and potential open access transmission customers with electronically accessible information about available transmission capacity, prices, and other information that will enable them to obtain open access non-discriminatory transmission service.

As a non-profit public benefit corporation responsible for the reliable operation of California's wholesale electric transmission grid, the CAISO is subject to the Commission's OASIS requirements. However, the CAISO's status as an independent system operator, the nature of the ancillary service and imbalance energy markets that the CAISO operates, and the unique type of transmission services that the CAISO provides, differ significantly from the business model and the transmission services contemplated in the *pro forma* Open Access Transmission Tariff (OATT) and the OASIS standards. These differences have led the Commission to grant a series of waivers to the CAISO from the OASIS requirements.

The Commission initially granted the CAISO an interim waiver of the OASIS requirements at the time it approved the CAISO's operations as an independent transmission system operator. The Commission noted as relevant factors in this determination the lack of reserved firm and non-firm point-to-point transmission service under the CAISO Tariff and the incompatibility of the CAISO computer communication

Stats & Regs. ¶ 31,261 (2007); Order No. 890-A, 121 FERC ¶ 61,297 (2007); Order No. 890-B, 123 FERC ¶ 61,299 (2008); and Order No. 676-C, *Standards for Business Practices and Communication Protocols for Public Utilities*, 124 FERC ¶ 61,070 (2008).

system with the OASIS standards and protocols.² Although it granted the interim waiver, the Commission expressly found that the CAISO's communication system "meets the needs of . . . Market Participants, including the [CAISO's] transmission customers."³

The Commission limited the initial interim waiver to the period prior to the implementation of the CAISO's transmission rights proposal. However, at the time the Commission approved the CAISO's Firm Transmission Rights proposal, the Commission extended the waiver. *California Independent System Operator Corporation*, 89 FERC ¶ 61,153, at 61,437-38 (1999). The waiver remains in effect today.

In Order No. 676, issued on April 25, 2006, the Commission amended its regulations to incorporate by reference a number of business practice standards promulgated by the Wholesale Electric Quadrant ("WEQ") of the North American Energy Standards Board.⁴ In particular, the Commission adopted several OASIS business practice standards that electric utilities were required to follow. On June 1, 2006, the CAISO filed a petition in which it sought waiver of the OASIS requirements and other business practice standards adopted by the Commission in Order No. 676.

On November 16, 2006, the Commission issued an order granting the CAISO's request for waiver of OASIS standards WEQ-001 through WEQ-003 adopted in Order No. 676.⁵ In the November 16 Order, the Commission noted that it had previously

² *Pacific Gas & Electric Co., et al.*, 81 FERC ¶ 61,122 at 61,460 (1997) ("PG&E").

³ *Id.*

⁴ *Standards for Business Practices and Communication Protocols for Public Utilities*, Order No. 676, 71 Fed. Reg. 26,199, FERC Stats. & Regs., Regulations Preambles ¶ 31,216 (2006).

⁵ *California Independent System Operator Corporation*, 117 FERC ¶ 61,196 (2006).

granted the CAISO waiver of the OASIS requirements of Order No. 889 and stated that it was continuing the waiver because the circumstances that led to the granting of the waiver remain valid. The Commission also granted the CAISO's request for waiver of the WEQ standards relating to redirects and multiple requests because these standards are incompatible with the transmission services the CAISO provides under its tariff. Further, the Commission granted the waiver of all OASIS standards (WEQ-001 through WEQ-003) until the CAISO's MRTU is implemented. The Commission directed the CAISO to either comply with or seek further waiver of these OASIS standards sixty days prior to the date on which it implements MRTU.

On February 16, 2007, the Commission issued Order No. 890, which modified the *pro forma* OATT to ensure that it remedies undue discrimination and to increase transparency in the rules applicable to planning and use of the transmission system. Order No. 890 also included revisions to the OASIS posting requirements.⁶ As part of the CAISO's compliance filing for Order No. 890, filed on October 11, 2007, in Docket No. OA08-12-000, the CAISO sought a waiver from the revised OASIS posting requirements pertaining to denials of service, the designation of network resources, and the posting of system impact studies, facilities studies and studies performed for the transmission provider's own network resources. The CAISO requested the waiver because such services and studies are not undertaken under the CAISO's service model. The Commission approved the compliance filing and accepted this aspect of the CAISO's compliance demonstration.⁷

⁶ *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).

⁷ See *California Independent System Operator Corporation*, 123 FERC ¶ 61,180 (2008).

In the October 11, 2007 compliance filing, the CAISO additionally requested a partial waiver of the Order No. 890 requirement that transmission providers post load data (*i.e.*, load forecasts and daily peak load) for each load-serving entity or control area in their footprint. The CAISO instead proposed to post the load data for each of the three former investor-owned utility regions that now comprise the CAISO control area. The Commission granted the requested waiver of the load data posting requirements and accepted the CAISO's proposal to post such data for the three regions.⁸

In Order No. 676-C, issued on July 21, 2008, the Commission revised its regulations to incorporate by reference the latest version (Version 001) of the WEQ standards.⁹ These updated WEQ standards, in pertinent part: (1) revised the OASIS business practice standards (WEQ -001 through WEQ-003); (2) added new standards on transmission loading relief for the Eastern Interconnection (WEQ-008); (3) added new standards for public key infrastructure (WEQ-012); and (4) added a new OASIS implementation guide (WEQ-013).

On September 26, 2008, the CAISO filed a petition requesting a full waiver of the Version 001 standards WEQ-001 through WEC-003, WEQ-008, and WEQ-013, and a limited waiver of Standard WEQ-012 to the extent that it applies to OASIS applications. In support of its petition, the CAISO stated that the circumstances that warranted the prior waiver of the OASIS WEQ standards remain valid and support the requested waiver of the updated standards. By letter order dated December 30, 2008 in Docket No. ER08-1591-000, 125 FERC ¶¶ 61,380 (2008), the Commission granted the requested waivers, including waiver of the OASIS requirements in WEQ-001, WEQ-002,

⁸ Id. at ¶¶ 62,220.

⁹ Order No. 676-C, *Standards for Business Practices and Communication Protocols for Public Utilities*, 124 FERC ¶¶ 61,070 (2008).

WEQ-003, and WEQ-013.

II. OASIS AUDIT

The Commission's Division of Audits in the Office of Enforcement recently conducted an audit of the CAISO's compliance with the OASIS requirements under 18 C.F.R. § 37.6 (2008). The audit covered the period from March 17, 2008 through June 13, 2008, and included review of information posted on the CAISO's OASIS website, interviews with CAISO personnel, and consideration of documentation prepared by the CAISO to support and explain the waivers in place. In its letter order and audit report dated August 22, 2008 in Docket No. PA08-20-000, the Division of Audits confirmed the waivers in effect, found no instances of non-compliance with the standards by the CAISO, and determined that no corrective action was necessary.¹⁰

III. REQUEST FOR WAIVER

As described above, the Commission previously granted the CAISO a waiver of the OASIS requirements in *PG&E* and extended it in the FTR Order. The Commission also waived the revised OASIS posting requirements adopted in Order No. 890. Further, in its November 16, 2006 Order, the Commission granted the CAISO a waiver of the OASIS business practice standards WEQ -001, 002 and 003. The December 30, 2008 letter order confirmed the waiver of these WEQ business practice standards and granted a waiver of the OASIS requirements in WEQ-013. These waivers recognize that many of the OASIS requirements simply are inapplicable to, or incompatible with, the CAISO's operations and transmission service model.

The OASIS requirements and WEQ OASIS business practice standards are

¹⁰ *Audit of Open Access Same-Time Information System Requirements at California Independent System Operator Corp.*, Docket No. PA08-20-000 (August 22, 2008).

based on the transmission service model embodied in the *pro forma* OATT.¹¹ That service model contemplates that electric utilities provide two types of transmission service -- network service and (firm and non-firm) point-to-point service. Under the *pro forma* OATT service model, customers submit formal transmission service requests to the transmission provider in order to reserve capacity. Users may also, on a first-come first-served basis, reserve available transmission capacity on a long-term basis. The *pro forma* OATT service model additionally accommodates resale transactions (*i.e.*, reassignments) and transfers of transmission reservation rights, as well as firm and non-firm redirects.

The CAISO does not offer the two distinct transmission services (*i.e.*, network service and point-to-point service) contemplated in the *pro forma* OATT. Rather, the CAISO provides a single transmission service, available daily to all eligible customers on a non-discriminatory basis.¹² Energy transmitted under the CAISO Tariff is treated as “new firm use” and scheduled on a day-to-day basis by transmission customers (with the exception of certain transactions scheduled pursuant to contracts that preceded the existence of the CAISO, referred to as Existing Contracts). All users of the CAISO Controlled Grid must schedule their use each day and cannot reserve available

¹¹ In its Order No. 890 compliance filing filed on October 11, 2007 in Docket No. OA08-12, the CAISO demonstrated that its “daily” transmission service model differed substantially from the transmission service model in the *pro forma* OATT and that the transmission service-related changes (*e.g.*, changes related to network and point-to-point transmission services, capacity reassignments, and roll-over rights) adopted in Order No. 890 did not apply to, and/or were incompatible with, the CAISO’s service model. The CAISO also demonstrated that its transmission service model was consistent with or superior to the *pro forma* OATT service model as revised in Order No. 890. FERC accepted the CAISO’s compliance demonstration on these matters. See *California Independent System Operator Corporation*, 123 FERC ¶ 61,180 at 62,216 (2008).

¹² The open access transmission service provided by the CAISO is essentially a network type service, but with more flexibility than the network service under the *pro forma* OATT.

transmission capacity beyond the day-ahead timeframe.¹³ There are no long-term reservations of physical transmission capacity under the CAISO's service model, and there is no application process for transmission service requests nor performance of transmission service request studies.

Under the CAISO's MRTU transmission service model, Scheduling Coordinators submit bids (including self-schedules) for the supply or demand for energy to the CAISO. Scheduling Coordinators have equal access to all available capacity every day and can make changes to their bids on an hourly basis. In contrast to traditional transmission services provided under the *pro forma* OATT, customers that take transmission service under the MRTU Tariff need not formally designate network resources. The CAISO utilizes a bid-based, security constrained economic dispatch/redispach process to balance real-time control area requirements, utilize the full capability of the grid to maximize the transmission service that can be provided to eligible customers, provide customers with maximum flexibility to schedule transactions, and ration capacity when demand for transfer capability exceeds supply. Thus, the CAISO's transmission service provides comparable treatment to all customers and encourages efficient and flexible use of the transmission system.

Also, the CAISO does not offer conditional firm transmission service. It was not

¹³ Under the CAISO's Commission-approved service model, there are no long-term reservations of transmission capacity or rollover rights. As the Commission has recognized, the CAISO's "proposal to schedule transmission in a day-ahead and hour-ahead basis is not compatible with the long-term reservation of discrete physical transmission rights." *PG&E* at 61,472. Accordingly, the Commission has ordered customers to take service under the CAISO Tariff upon contract expiration. *Id.* at 61,463-65. The Commission found that the right of first refusal provision under Order No. 888 does not apply to customers in the CAISO service territory because the service model under the Order No. 888 *pro forma* OATT does not apply to the CAISO. *Sacramento Municipal Utility District v. Pacific Gas & Electric Company, et al.* 105 FERC ¶ 61,237 (2004), *aff'd sub nom., Sacramento Municipal Utility District v. FERC*, 428 F. 3d 294 (D.C. Cir. 2005).

required to do so by Order No. 890¹⁴ and will not undertake that type of service under MRTU.

Further, in contrast to traditional transmission services provided under the *pro forma* OATT, CAISO customers that take transmission service need not formally designate and un-designate network resources. The CAISO today, and under MRTU, utilizes a bid-based, economic dispatch/re-dispatch process to balance real-time Balancing Authority Area requirements, utilizes the full capability of the grid to maximize the transmission service that can be provided to eligible customers, provides customers with maximum flexibility to schedule transactions, and rations capacity when demand for transfer capability exceeds supply.

In short, the CAISO's transmission service model does *not* have any of the following features typically associated with *pro forma* OATT transmission service: separate network and point-to-point transmission services; non-firm transmission services; formal transmission service requests (and applications); transmission service reservations; resales (or reassignments); redirects; network resources; or transfers of transmission reservation rights or rollovers rights. Accordingly, most OASIS requirements cannot be applied to the CAISO's transmission service model.

Consistent with the foregoing discussion, the CAISO requests that the Commission grant waivers as necessary to recognize the OASIS requirements and WEQ OASIS business practice standards that will be inapplicable to and/or

¹⁴ In Order No. 890, the Commission stated that it would be inappropriate to require ISOs and RTOs with real-time energy markets to provide conditional firm point-to-point service. Order No. 890 at P 992. Because the CAISO has a real-time energy market it is not required to provide conditional firm point-to-point service. The Commission accepted this aspect of the CAISO's compliance demonstration in approving the CAISO's Order No. 890 compliance filing filed on October 11, 2007 in Docket No. OA08-12-000. See *California Independent System Operator Corporation*, 123 FERC ¶ 61,180 at 62,214-15(2008).

incompatible with the CAISO's service model under the MRTU structure.¹⁵ Specifically, the CAISO requests waiver from the following OASIS requirements:

- 18 C.F.R. § 37.2(b) – Waiver of this provision that requires OASIS to provide information about ATC for point-to-point service, provide a process for requesting transmission service, and enable Transmission Providers and Transmission Customers to communicate promptly about requests to and responses to buy and sell ATC under the Transmission Provider's tariff. As indicated above, the CAISO does not provide point-to-point transmission service and does not have a formal transmission service request process.
- 18 C.F.R. § 37.6(a)(1) – Waiver of this provision that requires OASIS to provide detail and have capability to allow transmission customers to make requests for transmission services, request the designation of a network resource, and request the termination of the designation of a network resource. The CAISO does not have a formal transmission request process and does not offer network service. Thus, the designation of network resources is unnecessary.
- 18 C.F.R. § 37.6(a)(4) – Waiver of this provision that requires the posting of information related to transmission service requests that were denied or interrupted. Because the CAISO does not have a formal transmission request process, no transmission service requests are denied or interrupted.
- 18 C.F.R. § 37.6(a)(5) – Partial waiver, to extent this provision requires the

¹⁵ The following list contains only those OASIS provisions for which the CAISO requests waiver. Under MRTU, the CAISO will comply with the OASIS provisions that are not enumerated in this list and is not seeking a waiver of those requirements.

posting of information related to historical transmission service requests. This OASIS requirement is inapplicable for the reasons stated above.

- 18 C.F.R. § 37.6(b)(1), (b)(2)(i) and (ii), and (b)(3)(i), (ii) and (iii) – Waiver of these provisions that require posting firm and non-firm ATC, TTC, ¹⁶ CBM, and TRM. The CAISO does not use CBMs or TRMs for operational purposes, and has not done so since the California energy crisis of 2000-2001.¹⁷
- 18 C.F.R. § 37.6(b)(2)(iii) – Waiver of this provision that requires posting system planning studies, facilities studies, and specific network impact studies. Because the CAISO does not have a formal transmission service request model, it does not perform system planning studies, facilities studies or network impact studies in connection with specific transmission service requests as is contemplated under the *pro forma* OATT.
- 18 C.F.R. § 37.6(c)(1), (3), (4), and (5) – Waiver of these provisions that

¹⁶ Although the CAISO has received and seeks to continue waiver of these requirements, the CAISO exceeds the Order No. 890 requirements for explaining a monthly or yearly change in ATC on a constrained path, or the absence of change in ATC for an extended period. As the CAISO explained in its October 11 Compliance Filing, which was accepted by the May 16 Order, the CAISO posts on OASIS the impact and a brief description of the cause of every outage on a constrained path that causes a derate. This includes outages that cause partial derates, below the 10 percent change in TTC that Order No. 890 contemplates as the threshold for posting a narrative explanation. The CAISO's postings also include outages of the path's total capacity for the short term, as well as those of an extended duration. Specifically, the CAISO publishes daily and hourly ATC forecasts on OASIS. The daily forecast (scheduled to occur by 1800 each day) includes: a 30-day look-ahead for scheduled outages with text reference to outages; a 7-day look ahead with forecast OTCs; and a daily forecast of finalized OTCs and ATCs for the following day-ahead market day (2 days in advance of the operating day). The hourly forecast (scheduled to occur at 40 minutes past hour) includes hour-ahead OTCs and ATCs. In addition, the outages and derates are reflected in system operating messages, which are published in real time and are accessible through OASIS, by link at the bottom of the OASIS home page.

¹⁷ See the CAISO's filings in Docket No. OA08-12-000 dated June 16, 2008 and Docket No. OA08-12-004 dated January 15, 2009 to comply with the ATC requirements of Order No. 890 and the May 16 Order.

require posting transmission service products and prices, discounts, information describing transmission service transactions, and information related to resales. The CAISO does not have a formal transmission service request model, nor products, prices, discounts, or resale related to such service.

- 18 C.F.R. § 37.6(c)(2) – Partial waiver, to extent this provision requires posting information related to transmission services as contemplated in the *pro forma* OATT.¹⁸ Again, the CAISO does not have a formal transmission service request model.
- 18 C.F.R. § 37.6(d)(1) – Partial waiver, to the extent this provision requires posting of ancillary services offers and prices as contemplated in the *pro forma* OATT.¹⁹ The CAISO procures ancillary services through the market, rather than through an offer and price for individual transactions.
- 18 C.F.R. § 37.6(d)(2), (3), (4), and (5) – Waiver of these provisions that require posting offers of discount for ancillary services, descriptions of ancillary service transactions, other interconnected operations service by the Transmission Providers, and offers of ancillary services and other interconnected operations services by customers and third parties. The CAISO procures ancillary services through the market, and does not offer discounts or enter into individual transactions.

¹⁸ The CAISO is requesting a partial waiver because it posts an electronic and downloadable file of its complete tariff consistent with 18 C.F.R. § 37.6(c)(2).

¹⁹ The CAISO is requesting a partial waiver, rather than a full waiver, because it posts detailed information about the Ancillary Services it competitively procures in the day-ahead and real time markets.

- 18 C.F.R. § 37.6(e)(1), (2), and (3) – Waiver of these provisions that require posting specific transmission and ancillary service requests and responses as contemplated in the *pro forma* OATT, including denials of such requests for transmission service, and curtailments and interruptions of such transactions. The CAISO does not have a formal transmission service request model.
- 18 C.F.R. § 37.6(f) – Waiver of this provision that requires posting information about transmission service schedules as contemplated in the *pro forma* OATT. The CAISO's service model does not have transmission service schedules like those contemplated under the *pro forma* OATT.
- 18 C.F.R. § 37.6(g)(1), (2), (3), and (4) – Waiver of these provisions that require posting of other transmission-related communications, including want ads, conferencing space, messaging service, communications by third parties, notices of transfers of personnel as described in C.F.R. § 358.4(c), and logs related to exercises of discretion under C.F.R. § 358.5(c)(4). The transmission-related communications described in this provision pertain to transmission services under the *pro forma* OATT rather than the CAISO's service model. In addition, as a Commission-approved independent system operator, the CAISO is exempt from 18 C.F.R. Part 358, Standards of Conduct for Transmission Providers.
- 18 C.F.R. § 37.6(h)(1), (2), (3) and (4) – Waiver of these provisions that require posting of information summarizing the time to complete studies of transmission service requests as contemplated in the *pro forma* OATT, including measures for the process time from initial service request to offer of

system impact study agreement, system impact study processing time, withdrawn transmission service requests, process time from completed system impact study to offer of facilities study, facilities study processing time, and withdrawn service requests. These provisions are not applicable to, and/or are incompatible with the CAISO's service model, which does not have a formal transmission service request process or the studies that accompany such transmission service requests.

- 18 C.F.R. § 37.6(i)(1), (2), (3), and (4) – Waiver of these provisions that require posting data related to grants and denials of service as contemplated in the *pro forma* OATT, including metrics related to transactions by affiliates and non-affiliates. These provisions are not applicable because the CAISO does not have a formal transmission service request process and, as such, there are no grants or denials of service to be reported.
- 18 C.F.R. § 37.6(j)(1) and (2) – Waiver of these provisions that require posting of offers by third parties to relieve a specified congested transmission facility and information related to redispatch service. The CAISO utilizes a bid-based, security constrained economic dispatch/redispatch process, not offers and bi-lateral transactions as provided in the *pro forma* OATT.
- 18 C.F.R. § 38(a)(1), (2) and (3) – Waiver of these provisions that require compliance with Standards WEQ-001, WEQ-002, WEQ-003, and WEQ-013, which establish business practices for providing on OASIS information related to services contemplated in the *pro forma* OATT. Although the December 30, 2008 letter order recently granted the CAISO waiver from these WEQ

business standards, the CAISO has included these provisions of Part 38 in this waiver request in order to: (1) consolidate the applicability or waiver of all OASIS requirements into one global application; and (2) confirm that the waiver of these business standards continues under MRTU. Continuance of the waiver is appropriate because the CAISO's MRTU service model differs significantly from the *pro forma* OATT, as discussed above. Accordingly, the transmission services in the *pro forma* OATT are inapplicable to, or incompatible with, the MRTU service model and the WEQ business standards based on the *pro forma* services are equally inapplicable to and/or incompatible with the CAISO's MRTU services and should be waived.

The CAISO submits that the information that it will post on OASIS following the implementation of MRTU will meet the needs of Market Participants and that no Market Participant would be adversely affected by the granting of the waiver. Upon MRTU start-up, the CAISO will deploy a new OASIS site that contains robust information about the transmission grid and wholesale markets, and enhancements that will allow users to more easily select and download information of interest.²⁰ The information will be organized into major categories labeled as Atlas, Prices, Transmission, System Demand, Energy, Ancillary, CRR, and Public Bids.²¹

The Atlas category will list detailed information related to system and market data points, such as: Market Resource identification; Pricing Node locations and Aggregated Pricing Node locations used in CAISO markets; Load Participation Factors; Load Aggregation Points; and Trading Hubs. This category also will provide mapping of the

²⁰ To access the CAISO's new OASIS website, please use this link <http://oasissta.caiso.com/mrtu-oasis>.

²¹ In addition to these categories of information pertinent to MRTU, the CAISO's new OASIS will contain a link to the former OASIS site for the convenience of users to obtain historic information.

Pricing Nodes, Aggregated Pricing Nodes, Trading Hubs, Ancillary Service Regions, Reliability Unit Commitment Zones, Intertie Constraints, and Transmission Interfaces. In addition, the Atlas will list OASIS publications and revisions, and publication schedule, and will contain Operating System messages

The Price category will provide access to market pricing information that will be updated hourly and by interval. This information will include hourly and five-minute interval Locational Marginal Prices; Nomogram and Branch Shadow Prices, hourly and five-minute Ancillary Services Clearing Prices; hourly Intertie Constraint Shadow Prices; 15-minute Locational Marginal Prices for the Hour Ahead Scheduling Process; and the Locational Marginal Price for the current interval.

In the Transmission category, information pertinent to the status of each Transmission Interface will be available, including the interface's current transmission capacity and usage, planned and actual outage events, usage resulting from CAISO market operations, and available transmission capacity.

The System Demand category will provide a number of demand forecasts at the CAISO system level and for each Transmission Access Charge ("TAC") area, for time periods ranging from seven days in advance of the Trading Day to a five-minute interval. The earliest forecasts will be the CAISO's seven-day advance peak demand forecast for its control area and for each TAC area. Other available information for the CAISO system will include a 24-hour demand forecast, a two-day ahead hourly forecast, a Day Ahead Market hourly forecast, a five-minute Real Time Market load forecast, and actual hourly load. For each TAC area, the CAISO also will post a two-day ahead hourly forecast, Day Ahead Market hourly forecast, and hourly actual load.

In the Energy category, detailed information will be published about: System Load and Resource Schedules, by market, for the CAISO total and for each TAC area; Expected Energy; Exceptional Dispatch; Market Power Mitigation status; Reliability Must-Run capacity; Marginal Losses by market; and Resource Adequacy and Minimum Load Commitment data for each market.

The Ancillary category will set forth: the Ancillary Services capacity requirements by region for the two-day ahead forecast, Hour Ahead Scheduling Process, and Real Time Market; the capacity procured and self-scheduled for each Ancillary Service in each market, by region; and actual operating reserves.

For Congestion Revenue Rights, OASIS will provide, for each market term, the Auction Clearing Price by Pricing Node and the daily inventory.

The Public Bids category will make available bid data for the CAISO markets, subject to certain limited measures necessary to preserve market integrity. The bid information may have certain fields replaced with pseudo data before it is posted and it will be downloadable for a single day at a time.

By publishing the categories of information just described, the CAISO's new OASIS will provide extensive and relevant information pertinent to the CAISO's transmission service model and markets. It will provide Market Participants access to a broad range of the operational and market information, as well as very detailed data by area, by time period, and by market activity. The CAISO believes that the new OASIS website will meet, if not exceed, the intent of the Commission's OASIS requirements that are otherwise applicable to services provided by transmission providers consistent with the *pro forma* OATT. The CAISO submits that the inapplicability and/or

incompatibility of the OASIS requirements and OASIS business practice standards to the CAISO's service model, in conjunction with the robust OASIS website that will be deployed at MRTU startup, support and warrant approval of the waiver requested by the CAISO.

IV COMMUNICATIONS

Please address communications concerning this filing to the following person:

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V. SERVICE

The CAISO has served copies of this filing on the California Public Utilities Commission, the California Energy Commission, and all parties with Scheduling Coordinator Agreements under the CAISO Tariff. In addition, the CAISO has posted a copy of this filing on the CAISO Website.

VI. CONCLUSION

For the reasons stated above, the CAISO respectfully requests that the Commission grant this petition for waiver.

Respectfully submitted,



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Dated: January 23, 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 23rd day of January, 2009.



Anna Pascuzzo