



California Independent  
System Operator Corporation

January 29, 2009

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

**Re: California Independent System Operator Corporation  
Compliance Filing**

**Docket No. ER08-1591-000**

Dear Secretary Bose:

The California Independent System Operator (“CAISO”) hereby submits an original and five copies of the instant filing in compliance with the Federal Energy Regulatory Commission’s (“Commission”) December 30, 2008, Letter Order, 125 FERC ¶ 61,380, (“December 30 Order”). Two additional copies of this filing are enclosed to be date-stamped and returned in the self-addressed, stamped envelope.

## **I. BACKGROUND**

On July 29, 2008, the Commission issued Order No. 676-C which incorporated by reference the latest version of certain standards adopted by the North American Energy Standards Board’s (“NAESB”) Wholesale Electric Quadrant (“WEQ”). The Commission directed public utilities to comply with the revised standards and revise their open access transmission tariffs (“OATTs”) to include the revised standards. The Commission stated that if an electric utility requests waiver of a standard, it will not be required to comply with the standard until the Commission acts on the waiver request. If a waiver request is denied, the electric utility would be required to include in its OATT the standard(s) for which waiver was denied.

On September 26, 2008, the CAISO filed a *Petition for Waiver of Certain Business Practice Standards Adopted in FERC Order No. 676-C* (“September 26 Filing”). Specifically, the CAISO requested a waiver of the OASIS-related business practices standards adopted in Order 676-C (*i.e.* Standards WEQ-001, -002, -003 and -013), as well as a waiver of the business practice standard

pertaining to transmission loading relief (i.e., Standard WEQ-008). Additionally, the CAISO requested a limited waiver of Standard WEQ-012 -- Public Key Infrastructure ("PKI") -- to the extent that it applied to OASIS applications.

In its December 30 Order, the Commission granted the CAISO's request for a waiver of NAESB WEQ Standards WEQ-001, -002, -003, -008, -013 and a limited waiver of NAESB WEQ Standard WEQ-012 as it applies to the CAISO's current tariff. The Commission also noted that in Docket No. ER09-169 the CAISO had filed tariff sheets for its existing (non-MRTU) tariff that indicate that the CAISO has applied for a waiver of the NAESB WEQ standards discussed in the September 26 Filing and the December 30 Order. The Commission directed the CAISO to file new tariff sheets for its currently effective tariff that state that these waivers have been granted.

## **II. COMPLIANCE WITH THE DECEMBER 30 ORDER**

In compliance with the December 30 Order, the CAISO hereby submits revisions to Section 7.2.2.4 of the CAISO's Currently Effective Tariff that states the above-referenced waivers have been granted. Specifically, the revised tariff provisions indicate that the CAISO has been granted (1) a waiver of NAESB WEQ Standards WEQ -001, -002, -003, -008 and -013, and (2) a limited waiver of NAESB WEQ Standard WEQ-012 to the extent that it applies to OASIS applications.

## **III. MATERIALS PROVIDED IN THE INSTANT COMPLIANCE FILING**

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

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|--------------|---|
| Attachment A | Clean ISO Tariff sheets incorporating the black-lined changes contained in Attachment B           |
| Attachment B | Black-lined changes to the current ISO Tariff to implement the revisions contained in this filing |

#### **IV. CONCLUSION**

The CAISO respectfully requests that the Commission accept the instant filing as complying with the directives of the December 30 Order. Please contact the undersigned with any questions concerning this filing.

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 captioned 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 this 29th day of January, 2009.

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Anna Pascuzzo