

July 17, 2015

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

**Re: California Independent System Operator Corporation  
Filing to Comply with Order On Requests For Waiver  
Docket No. ER15-531-000**

Dear Secretary Bose:

The California Independent System Operator Corporation (“CAISO”)<sup>1</sup> submits this filing in compliance with the Commission’s Order On Requests For Waiver<sup>2</sup>, issued May 18, 2015. In Order No. 676-H<sup>3</sup>, the Commission directed public utilities, including the CAISO, to incorporate in their jurisdictional tariffs the latest versions of the business practice standards promulgated by the Wholesale Electric Quadrant (“WEQ”) of the North American Energy Standards Board (“NAESB”) and included by reference in the Commission’s regulations. The CAISO filed for waiver of certain of these standards, which the Commission granted in its Waiver Order. As part of that order, the Commission directed the CAISO to make a compliance filing, within 60 days of the date of the order, to revise section 7.3.3 of its tariff to indicate those standards for which the Commission has granted waiver and to cite the order granting the waiver.<sup>4</sup> The CAISO accordingly requests that the Commission accept the enclosed tariff

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<sup>1</sup> Capitalized terms not otherwise defined herein have the meanings set forth in appendix A to the CAISO tariff.

<sup>2</sup> *Order on Requests for Waiver*, Docket No. ER15-531-000 (May 18, 2015), 151 FERC ¶ 61,151 (“Waiver Order”).

<sup>3</sup> *Standards for Business Practices and Communication Protocols for Public Utilities*, Order No. 676-H, 79 Fed. Reg. 56939-01 (Sept. 24, 2014), 148 FERC ¶ 61,205, as corrected, 79 Fed. Reg. 60953-01 (Oct. 9, 2014), 149 FERC ¶ 61,014 (2014) (“Order No. 676-H”).

<sup>4</sup> 148 FERC ¶ 61,205, at P 6.

revisions in compliance with the Commission's Waiver Order, effective May 15, 2015.

## I. Background

In Order No. 676-H, the Commission amended its regulations to incorporate by reference the latest version (Version 003) of specified business practice standards that NAESB filed with the Commission on September 18, 2012, and January 29, 2013. The Version 003 NAESB standards include updates to earlier versions of those standards that the Commission previously incorporated by reference into its regulations. The Version 003 standards also include the following five new categories of standards that NAESB developed in response to the Order No. 890 series of orders: (1) standards to support network integration transmission service on an Open Access Same-Time Information System ("OASIS"); (2) standards to support Service Across Multiple Transmission Systems; (3) standards to support the Commission's policy regarding rollover rights for redirects on a firm basis; (4) standards that incorporate the functionality for transmission providers to credit redirect requests with the capacity of the parent reservation; and (5) modifications to standards to support consistency across the OASIS-related standards.<sup>5</sup>

The Version 003 standards also include modifications to the OASIS-related standards to support Order Nos. 676, 676-A, 676-E, and 717, and to add consistency. In addition, the Version 003 standards include modifications to the Coordinate Interchange standards to complement updates to e-tag specifications, modifications to the Gas Coordination Standards to provide consistency between the gas and electric markets, and reorganized and revised definitions to create a standard set of terms, definitions, and acronyms applicable to all the standards.<sup>6</sup>

Order No. 676-H directed public utilities to revise their Open Access Transmission Tariffs ("OATTs") to incorporate certain NAESB standards by reference.<sup>7,8</sup>

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<sup>5</sup> 148 FERC ¶ 61,205, at PP 2, 10.

<sup>6</sup> 148 FERC ¶ 61,205, at PP 3, 11-17.

<sup>7</sup> 148 FERC ¶ 61,205, at P 89; 149 FERC ¶ 61,014, at P 1. The Commission also incorporated those NAESB standards into its regulations by reference. *Id.* The Version 003 standards also included Smart-Grid-related standards, which the Commission incorporated into its regulations by reference for informational purposes but did not require public utilities to include in their OATTs. 148 FERC ¶ 61,205, at PP 19, 77-78.

<sup>8</sup> 148 FERC ¶ 61,205, at PP 55-56.

The Commission directed public utilities to submit their Order No. 676-H compliance filings by December 1, 2014, and to make the OATT revisions in those filings effective as of February 2, 2015.<sup>9</sup> Subsequently, the February 2, 2015 deadline was extended to May 15, 2015.<sup>10</sup> The CAISO submitted its initial compliance filing on December 1, 2014.<sup>11</sup> FERC accepted this filing on April 23, 2015.<sup>12</sup>

In addition, the Commission stated that if a public utility seeks either to renew an existing waiver or to request a new waiver of any of the NAESB standards listed above, it should also file its request for waiver by December 1, 2014.<sup>13</sup> Accordingly, CAISO filed its petition to waive certain of the NAESB standards on December 1, 2014.<sup>14</sup> On May 18, 2015, the Commission issued its Waiver Order, wherein the Commission granted in part and dismissed in part the CAISO's requests for waiver.<sup>15</sup> Specifically, the Commission granted the CAISO's requests for continued waiver of WEQ-002, WEQ-003, and WEQ-013, as well as a renewed partial waiver of WEQ-001 and WEQ-012. The Commission dismissed as unnecessary the CAISO's request for waiver of WEQ-008. Finally, with respect to the granted waiver of the standards cited above, the Commission directed the CAISO to make a compliance filing, within 60 days of the date of the Order, to revise section 7.3.3 of its tariff to indicate those standards for which the Commission has granted waiver, and for each of those standards granted waiver, to include a cite to the order granting the waiver requests.

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<sup>9</sup> 148 FERC ¶ 61,205, at P 95. The Commission stated that filings to comply with WEQ-002-5.10.3 (which concerns the network integration transmission service OASIS template) are due by January 24, 2016. *Id.* at P 86; 149 FERC ¶ 61,014, at P 2.

<sup>10</sup> *Standards for Business Practices and Communication Protocols for Public Utilities, Notice Granting Limited Time Extension*, Docket No. RM05-5-024 (issued Jan. 15, 2015).

<sup>11</sup> Letter, dated December 1, 2014, from John E. Spomer to the Hon. Kimberly D. Bose, submitted in Docket No. RM05-5-022.

<sup>12</sup> Letter, dated April 23, 2015, from Steve P. Rodgers at FERC (accepting CAISO's compliance filing).

<sup>13</sup> 148 FERC ¶ 61,205, at PP 72-73, 86-88. However, the Commission stated that filings to comply with WEQ-002-5.10.3 (which concerns the network integration transmission service OASIS template) and any requests for waiver of that NAESB standard are due by January 24, 2016. *Id.* at PP 86, 94; 149 FERC ¶ 61,014, at P 2.

<sup>14</sup> Petition Of The California Independent System Operator Corporation For Waiver Of Certain Business Practice Standards Adopted In Order No. 676-H, submitted in FERC Docket No. RM05-5-022, on December 1, 2014.

<sup>15</sup> Waiver Order, PP. 5-6.

## II. Proposed Tariff Revisions

Adoption of the Version 003 NAESB standards set forth in Order No. 676-H does not require any changes or revisions to the existing provisions of the CAISO tariff. Therefore, in accordance with Order No. 676-H, the CAISO previously revised section 7.3.3 of its tariff to incorporate those NAESB standards by reference.

Now, the CAISO has revised tariff section 7.3.3 further to list the Version 003 NAESB standards for which the CAISO has been granted a waiver and citing the Commission's Waiver Order, issued May 18, 2015.<sup>16</sup>

## III. Effective Date

Pursuant to the directives in the Waiver Order, the CAISO requests that the Commission accept the tariff revisions contained in this filing effective as of May 15, 2015.

## IV. Communications

Correspondence and other communications regarding this filing should be directed to:

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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 the filing on the CAISO website.

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<sup>16</sup> 151 FERC ¶ 61,151, at P 6.

## **VI. Contents of this Filing**

In addition to this transmittal letter, this filing includes the following attachments:

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|--------------|--|
| Attachment A | Clean CAISO tariff sheets incorporating the compliance changes described above |
| Attachment B | Red-lined document showing the revisions contained in this compliance filing   |

## **VII. Conclusion**

For the reasons set forth in this filing, the CAISO respectfully requests that the Commission accept the tariff revisions contained in the filing as compliant with the Waiver Order, effective as of May 15, 2015.

Respectfully submitted,

**By: /s/ John E. Spomer**

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**Attachment A– Clean Tariff**

**Order 676-H NAESB Requirements Waiver- Compliance**

**California Independent System Operator Corporation**

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### 7.3.3 NAESB Standards

The following standards of the Wholesale Electric Quadrant (WEQ) of the North American Energy Standards Board (NAESB) are incorporated by reference, except to the extent FERC has granted waiver of such NAESB WEQ standards:

- WEQ-000, Abbreviations, Acronyms, and Definition of Terms, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Oct. 4, 2012, Nov. 28, 2012 and Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);
- WEQ-001, Open Access Same-Time Information System (OASIS), OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013) excluding Standards 001-9.5, 001-10.5, 001-14.1.3, 001-15.1.2 and 001-106.2.5, and exclusively as to Standards 001-13.1.1, 001-13.1.4, 001-13.1.5, and 001-16;
- WEQ-002, Open Access Same-Time Information System (OASIS) Business Practice Standards and Communication Protocols (S&CP), OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Nov. 28, 2012 and Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);
- WEQ-003, Open Access Same-Time Information System (OASIS) Data Dictionary Business Practice Standards, OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);
- WEQ-004, Coordinate Interchange, WEQ Version 003, July 31, 2012 (with Final Action ratified on December 28, 2012);
- WEQ-005, Area Control Error (ACE) Equation Special Cases, WEQ Version 003, July 31, 2012;

- WEQ-006, Manual Time Error Correction, WEQ Version 003, July 31, 2012;
- WEQ-007, Inadvertent Interchange Payback, WEQ Version 003, July 31, 2012;
- WEQ-008, Transmission Loading Relief (TLR) – Eastern Interconnection, WEQ Version 003, July 31, 2012 (with minor corrections applied November 28, 2012);
- WEQ-011, Gas / Electric Coordination, WEQ Version 003, July 31, 2012;
- WEQ-012, Public Key Infrastructure (PKI), WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Oct. 4, 2012);
- WEQ-013, Open Access Same-Time Information System (OASIS) Implementation Guide, OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);
- WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response, WEQ Version 003, July 31, 2012; and
- WEQ-021, Measurement and Verification of Energy Efficiency Products, WEQ Version 003, July 31, 2012.

Pursuant to FERC's Order on Requests for Waiver, Docket No. ER15-531-000 (May 18, 2015), 151 FERC ¶ 61,151, the CAISO has been granted a waiver of the following NAESB WEQ standards:

- WEQ-001, Open Access Same-Time Information System (OASIS), OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013) excluding Standards 001-9.5, 001-10.5, 001-14.1.3, 001-15.1.2 and 001-106.2.5, and except as set forth above;
- WEQ-002, Open Access Same-Time Information System (OASIS) Business Practice Standards and Communication Protocols (S&CP), OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions

ratified on Nov. 28, 2012 and Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);

- WEQ-003, Open Access Same-Time Information System (OASIS) Data Dictionary Business Practice Standards, OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);
- WEQ-012, Public Key Infrastructure (PKI), WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Oct. 4, 2012) to the extent it applies to OASIS applications; and
- WEQ-013, Open Access Same-Time Information System (OASIS) Implementation Guide, OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013).

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**Attachment B– Marked Tariff**

**Order 676-H NAESB Requirements Waiver- Compliance**

**California Independent System Operator Corporation**

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### 7.3.3 NAESB Standards

The following standards of the Wholesale Electric Quadrant (WEQ) of the North American Energy Standards Board (NAESB) are incorporated by reference, except to the extent FERC has granted waiver of such NAESB WEQ standards:

- WEQ-000, Abbreviations, Acronyms, and Definition of Terms, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Oct. 4, 2012, Nov. 28, 2012 and Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);
- WEQ-001, Open Access Same-Time Information System (OASIS), OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013) excluding Standards 001-9.5, 001-10.5, 001-14.1.3, 001-15.1.2 and 001-106.2.5, and exclusively as to Standards 001-13.1.1, 001-13.1.4, 001-13.1.5, and 001-16;
- WEQ-002, Open Access Same-Time Information System (OASIS) Business Practice Standards and Communication Protocols (S&CP), OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Nov. 28, 2012 and Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);
- WEQ-003, Open Access Same-Time Information System (OASIS) Data Dictionary Business Practice Standards, OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);
- WEQ-004, Coordinate Interchange, WEQ Version 003, July 31, 2012 (with Final Action ratified on December 28, 2012);

- WEQ-005, Area Control Error (ACE) Equation Special Cases, WEQ Version 003, July 31, 2012;
- WEQ-006, Manual Time Error Correction, WEQ Version 003, July 31, 2012;
- WEQ-007, Inadvertent Interchange Payback, WEQ Version 003, July 31, 2012;
- WEQ-008, Transmission Loading Relief (TLR) – Eastern Interconnection, WEQ Version 003, July 31, 2012 (with minor corrections applied November 28, 2012);
- WEQ-011, Gas / Electric Coordination, WEQ Version 003, July 31, 2012;
- WEQ-012, Public Key Infrastructure (PKI), WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Oct. 4, 2012);
- WEQ-013, Open Access Same-Time Information System (OASIS) Implementation Guide, OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);
- WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response, WEQ Version 003, July 31, 2012; and
- WEQ-021, Measurement and Verification of Energy Efficiency Products, WEQ Version 003, July 31, 2012.

[Pursuant to FERC's Order on Requests for Waiver, Docket No. ER15-531-000 \(May 18, 2015\),](#)

[151 FERC ¶ 61,151,](#) the CAISO has ~~applied for~~[been granted](#) a waiver of the following NAESB

WEQ standards:

- WEQ-001, Open Access Same-Time Information System (OASIS), OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013) excluding Standards 001-9.5, 001-10.5, 001-14.1.3, 001-15.1.2 and 001-106.2.5, and except as set forth above;

- WEQ-002, Open Access Same-Time Information System (OASIS) Business Practice Standards and Communication Protocols (S&CP), OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Nov. 28, 2012 and Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);
- WEQ-003, Open Access Same-Time Information System (OASIS) Data Dictionary Business Practice Standards, OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013);
- ~~WEQ-008, Transmission Loading Relief (TLR) – Eastern Interconnection, WEQ Version 003, July 31, 2012 (with minor corrections applied November 28, 2012);~~
- WEQ-012, Public Key Infrastructure (PKI), WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Oct. 4, 2012) to the extent it applies to OASIS applications; and
- WEQ-013, Open Access Same-Time Information System (OASIS) Implementation Guide, OASIS Version 2.0, WEQ Version 003, July 31, 2012, as modified by NAESB final actions ratified on Dec. 28, 2012 (with minor corrections applied Nov. 26, 2013).

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