



July 28, 2021

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

**Re: California Independent System Operator Corporation**

**Filing of Amendment to Adjacent Balancing Authority Operating  
Agreement with Balancing Authority Area of Northern California**

**Docket No. ER21-\_\_\_\_-000**

Dear Secretary Bose:

The California Independent System Operator Corporation (“CAISO”) submits for Commission filing and acceptance Amendment No. 1 (“Amendment”) to the Adjacent Balancing Authority Operating Agreement (“ABAOA”) between the CAISO and the Balancing Authority of Northern California (“BANC”).<sup>1</sup> This filing includes several incremental revisions to the ABAOA. The CAISO requests that the Commission accept the ABAOA as revised by the Amendment, effective on September 27, 2021, *i.e.*, 61 days from the date of this filing.

## **I. Background**

The ABAOA sets forth the rates, terms, and conditions on which the CAISO and BANC, as balancing authorities registered with the North American Electric Reliability Corporation (“NERC”), operate the interconnection between their balancing authority areas and provide emergency assistance as required by the applicable NERC reliability standard. The Commission accepted the original version of the ABAOA between the CAISO and BANC, effective May 1, 2011.<sup>2</sup>

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<sup>1</sup> The CAISO submits the Amendment pursuant to Section 205 of the Federal Power Act, 16 U.S.C. § 824d.

<sup>2</sup> See *Cal. Indep. Sys. Operator Corp.*, Commission Letter Order, Docket No. ER11-3387-000 (June 7, 2011). The ABAOA is designated as CAISO Rate Schedule No. 69.

## II. Purposes of this Amendment

The CAISO and BANC propose to make incremental revisions to the ABAOA pursuant to this Amendment.<sup>3</sup> Specifically, the ABAOA has been amended to:

- a) Replace references to NERC Reliability Standard EOP-001 with references to EOP-011, which superseded EOP-001 and is the relevant NERC Reliability Standard currently in effect;
- b) Clarify that emergency assistance is the delivery of energy and does not include capacity; and
- c) Clarify the points of interconnection descriptions and include illustrations clarify the balancing authority area boundaries.

## III. Effective Date

The CAISO requests that the Commission accept the ABAOA, as revised by the Amendment, effective September 27, 2021, *i.e.*, 61 days from the date of this filing.

## IV. Service

The CAISO has served copies of this filing upon BANC, the California Public Utilities Commission, the California Energy Commission, and all parties to the proceeding in which the Commission accepted the original ABAOA (Docket No. ER11-3387-000). In addition, the CAISO has posted the filing on the CAISO website.

## V. Attachments

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

- |     |              |   |
|-----|--------------|---|
| (1) | Attachment A | Amendment to the ABAOA;                                     |
| (2) | Attachment B | Clean version of the ABAOA as revised by the Amendment; and |
| (3) | Attachment C | Marked version of the ABAOA as revised by the Amendment.    |

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<sup>3</sup> See *Cal. Indep. Sys. Operator Corp.*, Commission Letter Order, Docket No. ER18-2422 (October 18, 2018) (accepting similar updated references to EOP-011 and removal of the references to capacity in the emergency assistance provision with respect to NV Energy).

## VI. Correspondence

The CAISO requests that all correspondence, pleadings, and other communications concerning this filing be served upon the following:

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\* Individual designated for service pursuant to Rule 203(b)(3),  
18 C.F.R. § 203(b)(3).

## VII. Conclusion

The CAISO requests that the Commission accept the ABAOA between the CAISO and BANC, as revised by the Amendment, effective September 27, 2021.

Respectfully submitted,

**By: /s/ John C. Anders**

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