

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

**California Independent System            )       Docket No. ER13-69-\_\_\_\_  
Operator Corporation                    )**

**MOTION FOR EXTENSION OF TIME OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION  
TO FILE INFORMATIONAL REPORT**

The California Independent System Operator Corporation (“CAISO”)<sup>1</sup> respectfully requests an extension of time to file the informational report that the Commission directed to be filed in its March 18, 2013 order.<sup>2</sup> The informational report requires the CAISO to compare the new real-time disturbance dispatch functionality, accepted by the Commission in this proceeding, with the pre-existing contingency dispatch functionality. The CAISO requests Commission authorization to file the informational report 14 months after it successfully implements the disturbance dispatch functionality.

Good cause exists to grant this extension of time because issues have arisen during software testing of the new disturbance dispatch functionality that have, thus far, prevented it from being implemented. The CAISO continues to rely on the pre-existing contingency dispatch to manage contingency events, which is also authorized by the CAISO tariff. The CAISO proposes to file a

---

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

<sup>2</sup> *California Independent System Operator Corp.*, 142 FERC ¶ 61,189 (2013) (“March 18 order”). The CAISO files this motion pursuant to Rules 212 and 2008(a) of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.212, 385.2008(a).

notice to inform the Commission within 30 days of successful implementation of the real-time disturbance dispatch functionality, which will also specify the date by which it will submit the informational report.

## **I. Background**

In the March 18 order, the Commission accepted the CAISO's proposed tariff revisions to provide it with the authority to implement an alternative mode of its existing real-time contingency dispatch of operating reserves in the CAISO markets, referred to as real-time disturbance dispatch. The real-time disturbance dispatch would only be utilized in the event of a contingency event involving 300 MW or more of generation. If such a contingency were to occur, CAISO operators would have the option of using either the pre-existing contingency dispatch or the real-time disturbance dispatch. The benefit of the real-time disturbance dispatch is that it prioritizes the dispatch of spinning reserve in circumstances where it may be critical to recovery within the prescribed time limit. The Commission accepted the tariff revisions effective March 18, 2013.<sup>3</sup>

The Commission also directed the CAISO to file an informational report with the Commission within 14 months after the CAISO's proposal was implemented. The Commission stated that the report should include data regarding how often the CAISO has used the two modes of contingency dispatch (the real-time disturbance dispatch and real-time contingency dispatch) including how resources performed. In addition, the Commission stated that the report should include information about the cost impact associated with using the real-

---

<sup>3</sup> See tariff sections 34.3.2, 34.5.

time disturbance dispatch as opposed to real-time contingency dispatch, the status of planned software enhancements regarding real-time dispatch, and a review of whether both the real-time contingency dispatch and real-time disturbance dispatch processes remain necessary given the additional data.<sup>4</sup>

Although it was unclear whether the CAISO needed to file a motion based on the language of the March 18 order requiring the CAISO to file the informational report 14 months after implementation (rather than 14 months from the date of the order), on May 19, 2014, the CAISO nevertheless filed a motion for extension of time to submit the informational report because the real-time disturbance dispatch had not been implemented due to problems with the software. At that time, the CAISO anticipated that it would be able to implement the disturbance dispatch functionality by June 30, 2014. Therefore, the CAISO requested that the Commission permit it to file the informational report 14 months after June 30, *i.e.*, by August 31, 2015. The Commission has taken no action in response to the May 19, 2014 motion.

The CAISO has still not yet been able to implement the new real-time disturbance dispatch mode in production due to difficulties that emerged during recent testing. . Most recently, the CAISO tested the real-time disturbance functionality during the week of May 26, 2015. Although testing demonstrated that previously identified defects have been addressed, testing revealed that the functionality is still not operating consistent with the requirements. The CAISO is

---

<sup>4</sup> March 18 order at P 26. The Commission explained that the informational report would not be publicly noticed in the Federal Register and the Commission would not act on it. *Id.* at P 26 n.40.

working with its software vendor to address the variance and should be able to test again later this summer.

## **II. Motion for Extension of Time**

The CAISO continues to rely on the pre-existing real-time contingency dispatch while it works to resolve the unexpected challenges discussed above regarding implementation of the real-time disturbance dispatch.

For good cause shown, the Commission should grant this motion for an extension of time to file the informational report required by the March 18 order. Good cause exists due to the implementation and testing challenges noted above causing an implementation delay and resulting in a lack of data that can be discussed in the informational report.

The CAISO is working to resolve the testing issues with the real-time disturbance dispatch software. Within 30 days after the CAISO implements the disturbance dispatch functionality, which should allow for sufficient time to ensure that the software is functioning as intended, it will make a filing to inform the Commission of that event and to specify the date by which it will submit the informational report, *i.e.*, the date 14 months after the CAISO activates the software in production. Therefore, granting this motion for an extension of time will provide the CAISO with 14 months to gather data and prepare the report, which is the same amount of time directed in the March 18 order.<sup>5</sup>

---

<sup>5</sup> This motion supersedes the motion for extension of time the CAISO filed in this proceeding on May 19, 2014.

### III. Conclusion

For the foregoing reasons, the CAISO respectfully requests that the Commission granting the requested extension of time to file the informational report directed in the March 18 order as described above.

Respectfully submitted,  
**By: /s/ Sidney L. Mannheim**

Sean Atkins  
Bradley R. Miliauskas  
Alston & Bird LLP  
The Atlantic Building  
950 F Street, NW  
Washington, DC 20004  
Tel.: (202) 239-3300  
Fax: (202) 239-3333  
[sean.atkins@alston.com](mailto:sean.atkins@alston.com)  
[bradley.miliauskas@alston.com](mailto:bradley.miliauskas@alston.com)

Roger Collanton  
General Counsel  
Sidney L. Mannheim  
Assistant General Counsel  
California Independent System  
Operator Corporation  
Folsom, CA 95630  
Tel.: (916) 351-4400  
Fax: (916) 608-7222  
[smannheim@caiso.com](mailto:smannheim@caiso.com)

Counsel for the California Independent System Operator Corporation

Dated: July 8, 2015

## 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 above-referenced 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, CA this 8<sup>th</sup> day of July, 2015.

*/s/ Anna Pascuzzo*

Anna Pascuzzo