

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

California Independent System) Docket No. ER04-835-010
Operator Corporation)

**STATUS REPORT OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
RE FINAL INVOICING OF INTEREST**

The California Independent System Operator Corporation (CAISO) submits this informational status report on its final interest calculation and invoicing activity pursuant to the Commission’s Order on Compliance issued in this proceeding on March 1, 2021.¹ In the Order on Compliance, the Commission accepted compliance filings (as supplemented and amended) that the CAISO previously filed in the proceeding, directed the CAISO to calculate additional interest from March 31, 2020 through the date refunds are made, and directed the CAISO to file a final refund report with the invoice totals 30 days after the CAISO issues final invoices.²

The CAISO calculated additional interest from March 31, 2020 using the same methodology described in its previously filed refund reports and compliance filings³ and issued invoices on April 30, 2021. However, these are not the final invoices. A market participant raised a dispute regarding its invoice issued on April 30 that the CAISO subsequently determined was valid. The

¹ *Cal. Indep. Sys. Operator Corp.*, 174 FERC ¶ 61,166 (2000) (Order on Compliance).

² *Id.* at PP 39-40.

³ *See id.* at PP 41-42 (accepting the CAISO’s explanation of the calculation methodology and finding the CAISO provided the relevant data).

dispute did not relate to the methodology of the interest calculation or the interest rate used. Rather, the dispute concerned the failure to account for a minimum load-related billing adjustment that the CAISO had previously made to the owners of the California-Oregon Intertie for the July through December 2004 period. The CAISO had made the proper adjustment to the calculation of principal previously invoiced, but erroneously calculated interest. On this minimum load amount, the market participant submitted a dispute claiming it received \$1.7 million in excess interest. Other market participants also received excess interest or were erroneously charged interest. This issue only affects minimum load costs.

Because there is a valid dispute, the CAISO will need to recalculate interest on minimum load costs for all affected market participants and will then issue interest invoices, including additional interest through the date of the invoice., The CAISO anticipates these will be the final invoices. The CAISO will subsequently file a final refund report in accordance with the Order on Compliance within 30 days of issuing the final invoices.

Respectfully submitted,

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Dated: June 1, 2021

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, pursuant to the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Washington, DC this 1st day of June, 2021.

/s/ Daniel Klein

Daniel Klein

Davis Wright Tremaine LLP