

June 10, 2020

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

Re: California Independent System Operator Corporation

**Further Compliance Filing to Reconcile Overlapping
Commission-Approved Tariff Records**

Docket No. ER20-1281-001

Dear Secretary Bose:

On March 13, 2020, the California Independent System Operator Corporation (CAISO) submitted a compliance filing in this proceeding that contained revised records to reconcile overlapping tariff records in the Commission's eTariff system. The Commission accepted the CAISO's compliance filing by letter order issued May 12, 2020, subject to the CAISO's submittal of a further compliance filing that contains a revised tariff record including Commission-approved provisions in section 39.7.1.1.1.3 of the CAISO tariff. The instant compliance filing provides the revised tariff record required by the May 12, 2020 letter order.

The CAISO has served copies of this filing on all the parties to the service list for Docket No. ER20-1281. In addition, the CAISO is posting this filing on the CAISO website.

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If there are any questions concerning this filing, please contact the undersigned.

Respectfully submitted,

/s/ Sidney L. Mannheim

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Attachment A – Clean Tariff
Reconciliation Compliance Filing
California Independent System Operator
June 10, 2020

39.7.1.1.1.3 Calculation of Natural Gas Price

- (a) The CAISO will use different gas price indices for the Day-Ahead Market and the Real-Time Market. If a gas price index is unavailable for any reason, the CAISO will use the most recent available gas price index as set forth in Section 39.7.1.1.1.3(c).
- (b) For all Trading Days of the Day-Ahead Market, except for Mondays when the Monday-only gas price index is available and meets the liquidity criteria described below, the CAISO will calculate a gas price index based on natural gas commodity prices reported by the Intercontinental Exchange one (1) day prior to the applicable Trading Day between 8:00 a.m. and 9:00 a.m. Pacific Time for natural gas deliveries on the Trading Day. The natural gas commodity prices reported by the Intercontinental Exchange are volume-weighted average gas prices reported during its next-day trading window. For Monday Trading Days, the CAISO will use the Monday-only gas price index when it is reported by the Intercontinental Exchange three (3) days prior to the Monday Trading Day, provided:
 - (i) The historical average volume of the Monday-only gas price index at a given location, using no more than ninety (90) days of trading, is at least 25,000 MMBTUs based on the CAISO's test of whether the volume at a given location is above 25,000 MMBTUs at least once every six (6) months; and
 - (ii) On any given day the Monday-only gas price index published at the locations that meet the requirement in subsection (b)(i) above represents at least five (5) transactions.
- (c) For all Trading Days of the Real-Time Market, except for Mondays when the Monday-only gas price index is available and meets the liquidity criteria described below, the CAISO will calculate a gas price index using at least one (1) price from the following publications: Natural Gas Intelligence, SNL Energy/BTU's Daily Gas Wire, or Platt's Gas Daily. The CAISO will update the gas price indices for the Real-Time Market between 7:00 p.m. and 10:00 p.m. Pacific Time using the natural gas prices published one (1) day prior to the applicable Trading Day for natural gas deliveries on the Trading Day, unless gas prices are not published on that day, in which case the CAISO will use the most

recently published gas prices that are available. For Monday Trading Days, the CAISO will use the Monday-only gas price index when it is reported by the Intercontinental Exchange three (3) days prior to the Monday Trading Day, provided:

- (i) The historical average volume of the Monday-only gas price index at a given location, using no more than ninety (90) days of trading, is at least 25,000 MMBTUs based on the CAISO's test of whether the volume at a given location is above 25,000 MMBTUs at least once every six (6) months; and
- (ii) On any given day the Monday-only index gas price published at the locations that meet the requirement in subsection(c)(i) above represents at least five (5) transactions.

Attachment B – Marked Tariff
Reconciliation Compliance Filing
California Independent System Operator
June 10, 2020

39.7.1.1.1.3 Calculation of Natural Gas Price

- (a) ~~Except as set forth in Section 39.7.1.1.1.3(b), the CAISO will use different gas price indices for the Day-Ahead Market and the Real-Time Market, and a gas price index will be calculated using at least two prices from two or more of the following publications: Natural Gas Intelligence, SNL Energy/BTU's Daily Gas Wire, Platt's Gas Daily, and the Intercontinental Exchange.~~ If a gas price index is unavailable for any reason, the CAISO will use the most recent available gas price index as set forth in Section 39.7.1.1.1.3(c). ~~For the Day-Ahead Market, the CAISO will update the gas price indices between 19:00 and 22:00 Pacific Time using natural gas prices published on the day is two (2) days prior to the applicable Trading Day, unless gas prices are not published on that day, in which case the CAISO will use the most recently published prices that are available.~~
- (b) For all Trading Days of the Day-Ahead Market, except for Mondays when the Monday-only gas price index is available and meets the liquidity criteria described below, the CAISO will calculate a gas price index based on natural gas commodity prices reported by the Intercontinental Exchange one (1) day prior to the applicable Trading Day between 8:00 a.m. and 9:00 a.m. Pacific Time for natural gas deliveries on the Trading Day. The natural gas commodity prices reported by the Intercontinental Exchange are volume-weighted average gas prices reported during its next-day trading window. For Monday Trading Days, the CAISO will use the Monday-only gas price index when it is reported by the Intercontinental Exchange three (3) days prior to the Monday Trading Day, provided:
- (i) The historical average volume of the Monday-only gas price index at a given location, using no more than ninety (90) days of trading, is at least 25,000 MMBTUs based on the CAISO's test of whether the volume at a given location is above 25,000 MMBTUs at least once every six (6) months; and
 - (ii) On any given day the Monday-only gas price index published at the locations that meet the requirement in subsection (b)(i) above represents at least five (5) transactions.

~~If a daily gas price reported by the Intercontinental Exchange on the morning of the Day-~~

~~Ahead Market run exceeds one hundred twenty five (125) percent of any natural gas price index calculated for the Day-Ahead Market between 19:00 and 22:00 Pacific Time on the preceding day, the CAISO will utilize the gas price reported by the Intercontinental Exchange in all CAISO cost formulas and market processes for that day's Day Ahead Market that would normally utilize the natural gas price index calculated pursuant to this Section 39.7.1.1.1.3.~~

- (c) For all Trading Days of the Real-Time Market, except for Mondays when the Monday-only gas price index is available and meets the liquidity criteria described below, the CAISO will calculate a gas price index using at least one (1) price from the following publications: Natural Gas Intelligence, SNL Energy/BTU's Daily Gas Wire, or Platt's Gas Daily. The CAISO will update the gas price indices for the Real-Time Market between 7:00 p.m. and 10:00 p.m. Pacific Time using the natural gas prices published one (1) day prior to the applicable Trading Day for natural gas deliveries on the Trading Day, unless gas prices are not published on that day, in which case the CAISO will use the most recently published gas prices that are available. For Monday Trading Days, the CAISO will use the Monday-only gas price index when it is reported by the Intercontinental Exchange three (3) days prior to the Monday Trading Day, provided:
- (i) The historical average volume of the Monday-only gas price index at a given location, using no more than ninety (90) days of trading, is at least 25,000 MMBTUs based on the CAISO's test of whether the volume at a given location is above 25,000 MMBTUs at least once every six (6) months; and
 - (ii) On any given day the Monday-only index gas price published at the locations that meet the requirement in subsection(c)(i) above represents at least five (5) transactions.

CERTIFICATE OF SERVICE

I certify that I have served the foregoing document upon the parties listed on the official service list in 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 Washington, D.C., on this 10th day of June, 2020.

/s/ Daniel Klein
Daniel Klein