

153 FERC ¶ 61,138  
FEDERAL ENERGY REGULATORY COMMISSION  
WASHINGTON, D.C. 20426

November 3, 2015

In Reply Refer to:  
California Independent System  
Operator Corporation  
Docket Nos. ER15-1875-002  
ER15-1919-003  
ER15-2204-002

Alston & Bird LLP  
The Atlantic Building  
950 F Street, NW  
Washington, DC 20004

Attn: Mr. Bradley R. Miliauskas, Esq.

Reference: Petitions for Limited Waiver

Dear Mr. Miliauskas:

1. On October 27, 2015, the California Independent System Operator Corporation (CAISO) filed petitions (October 27 Petitions), in the referenced dockets, for limited tariff waiver to modify the effective date of the respective tariff provisions accepted by the Commission in those proceedings.<sup>1</sup> CAISO requests that the Commission defer the effectiveness of those tariff provisions until November 4, 2015. CAISO explains that the tariff provisions were intended to be part of CAISO's 2015 fall software release; however, the 2015 fall software release has been postponed until no later than November 4, 2015. CAISO indicates that its proposed delayed implementation date will

---

<sup>1</sup> *Cal. Indep. Sys. Operator Corp.*, 152 FERC ¶ 61,185 (2015) (Docket No. ER15-1875-000); *Cal. Indep. Sys. Operator Corp.*, 153 FERC ¶ 61,087 (2015) (Docket No. ER15-1919-002); and *Cal. Indep. Sys. Operator Corp.*, 152 FERC ¶ 61,195 (2015) (Docket No. ER15-2204-000).

allow it to address and implement CAISO's Energy Imbalance Market year one enhancements that are to be included in the 2015 fall software release.

2. CAISO asserts that good cause exists to grant the requested change in effective date, in that it is of limited scope as it would incur only an eight day delay in the effectiveness of the tariff provisions. CAISO also states that the waiver would address a concrete problem that needs to be remedied because the tariff revisions cannot go into effect until the 2015 fall software release is implemented. Lastly, CAISO contends that the waiver has no undesirable consequences because the existing tariff provisions are in effect today and will remain so until the new tariff provisions are implemented.

3. Notice of CAISO's filings was published in the *Federal Register*, 80 Fed. Reg. 67,737 (2015), with protests and interventions due on or before November 17, 2015. The Commission issued errata notices on October 29, 2015 shortening the comment period to November 2, 2015. No protests or adverse comments were received.

4. We will grant CAISO's petitions to permit the tariff revisions the Commission previously accepted to become effective on November 4, 2015, as requested. We agree with CAISO that the tariff revisions in these proceedings should remain bundled with the other enhancements to be included in the 2015 fall release. Consistent with the factors the Commission has traditionally considered in evaluating requests for waivers of tariff provisions,<sup>2</sup> we agree with CAISO that the request at issue here is limited in scope, addresses the need for CAISO to implement the recently approved Energy Imbalance Market year one enhancements into the 2015 fall software release, and that no party will be harmed by the request. For these reasons, we grant CAISO's petitions, as discussed herein.<sup>3</sup>

5. To the extent CAISO seeks to further defer the effectiveness of its tariff provisions as discussed herein, CAISO, in a future filing, should request an effective date of December 31, 9998, in accordance with the Commission's eTariff requirements. CAISO

---

<sup>2</sup> See, e.g., *New York Indep. Sys. Operator, Inc.*, 136 FERC ¶ 61,156, at PP 5, 7 (2011); *Southwest Power Pool, Inc.*, 135 FERC ¶ 61,032, at P 12 (2011); *Southwest Power Pool, Inc.*, 138 FERC ¶ 61,200, at P 5 (2012).

<sup>3</sup> See *Implementation Guide for Electronic Filing of Parts 35, 154, 284, 300, and 341 Tariff Filings* at 10, available at <http://www.ferc.gov/docs-filing/etariff/implementation-guide.pdf> (If the effective date is not known at the time of the filing, such as the effective date is contingent on Commission approval, or the closing of a transaction, etc., the date of 12/31/9998 must be used).

would then notify the Commission of the actual effective date within five business days, in an eTariff submittal using Type of Filing Code 150 – Report.

By direction of the Commission.

Nathaniel J. Davis, Sr.,  
Deputy Secretary.