

April 1, 2019

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

**Re: California Independent System Operator Corporation  
Compliance Filing  
Docket No. ER19-354-001**

Dear Secretary Bose:

The California Independent System Operator Corporation (“CAISO”) submits this filing in compliance with the Federal Energy Regulatory Commission’s (“Commission”) February 28, 2019 order (“February 28 Order”) in this proceeding.<sup>1</sup>

**I. Background and Discussion**

The February 28 Order accepted the CAISO’s November 16, 2018 filing, made pursuant to Section 205 of the Federal Power Act. In that filing, the CAISO sought to implement tariff revisions to incorporate generator contingencies and remedial action schemes into its market optimization and congestion pricing. The Commission’s acceptance of the proposed tariff revisions was contingent upon the CAISO submitting revised tariff language changing the term “generator output” to “generator maximum capacity,” in the definition of generation loss distribution factor (*GLDF*).<sup>2</sup> The Commission approved all other proposed tariff revisions as just and reasonable.

Consistent with the Commission’s February 28 Order, the CAISO has modified the use of the term in Appendix C to the CAISO tariff. The CAISO also removed an insubstantial typographical error in the same sentence (an unnecessary “of”). The CAISO has made no other changes to its proposed tariff revisions.

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<sup>1</sup> *California Independent System Operator Corp.*, 166 FERC ¶ 61,158 (2019).

<sup>2</sup> *Id* at PP 9, 12.

## II. Contents of Filing

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

- |              |  |
|--------------|--|
| Attachment A | Clean CAISO tariff sheets incorporating this tariff amendment; and           |
| Attachment B | Red-lined document showing the revisions contained in this tariff amendment. |

## III. Conclusion

The CAISO respectfully requests that the Commission approve the tariff modifications in contained this filing as fully complying with the February 28 Order. Please contact the undersigned if there are any questions regarding this filing.

Respectfully submitted,

/s/ William H. Weaver  
Roger E. Collanton  
General Counsel  
Sidney L. Mannheim  
Assistant General Counsel  
William H. Weaver  
Senior Counsel

Counsel for the California Independent  
System Operator Corporation

## CERTIFICATE OF SERVICE

I certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceedings, 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, California, this 1<sup>st</sup> day of April, 2019.

*/s/ Grace Clark*  
Grace Clark

**Attachment A – Clean Tariff**

**Compliance Filing**

**Generator Contingency and Remedial Action Scheme**

**California Independent System Operator Corporation**

**Appendix C**  
**Locational Marginal Price**

\* \* \* \* \*

**D. Marginal Congestion Component Calculations (Day-Ahead and Real-Time)**

\* \* \* \* \*

- $GLDF_{Og,n}$  is the generation loss distribution factor in the preventive generator contingency case  $g$ . The value is negative one when  $n$  is  $Og$ . This value is zero when  $n$  is not  $Og$ , and when  $n$  is not associated with a frequency response capable generator. This value is the committed generator maximum capacity at  $n$  divided by the sum of the maximum capacity from all committed frequency response capable generators when  $n$  is not  $Og$  and  $n$  is associated with a frequency response capable generator.

\* \* \* \* \*

**Attachment B – Marked Tariff**

**Compliance Filing**

**Generator Contingency and Remedial Action Scheme**

**California Independent System Operator Corporation**

**Appendix C**  
**Locational Marginal Price**

\* \* \* \* \*

**D. Marginal Congestion Component Calculations (Day-Ahead and Real-Time)**

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