

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

**California Independent System  
Operator Corp.**

**Docket Nos: EL08-88-000  
ER08-1178-000  
  
ER15-861-000  
  
ER20-273-000**

**MOTION FOR RELIEF OF LEGACY REPORTING REQUIREMENTS**

The California Independent System Operator Corporation (“CAISO”) respectfully submits this motion requesting the Commission authorize the CAISO to retire three discrete legacy informational reports.<sup>1</sup> Through this motion, the CAISO is requesting that the Commission grant relief from the obligation to continue submission of each of the three reports into legacy dockets maintained on the Commission’s eLibrary platform.<sup>2</sup> In a companion filing made pursuant to Section 205 of the Federal Power Act (“FPA”), the CAISO is seeking authorization to reduce the burden of certain legacy reporting requirements set forth in its tariff.<sup>3</sup> In both cases, the legacy reports have served their intended

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<sup>1</sup> The CAISO submits this request pursuant to Rule 212 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.212 (2024) (allowing for motions at any time and in any proceeding except an informal rulemaking proceeding).

<sup>2</sup> Each of the legacy reports submitted by the CAISO is maintained in the “E” library, classified as a “Report/Form,” and given the type description of “Other Utility Report.” See <https://www.ferc.gov/media/elibrary-classtype-information> (explaining the eLibrary classification system); see also <https://www.ferc.gov/media/filing-guide-and-qualified-documents-list> (listing all filing types and associated authorities).

<sup>3</sup> Simultaneously with this motion, the CAISO is proposing a tariff amendment to modernize the legacy reporting metrics for Market Disruption and Exceptional Dispatch reports

purposes and are no longer necessary. The CAISO will continue to make available clear, accessible, accurate, and timely information through its website. Good cause exists to grant the relief requested herein.<sup>4</sup>

## **I. BACKGROUND OF LEGACY REPORTING OBLIGATIONS**

As the CAISO explains in its companion Section 205 filing, in orders approving certain tariff changes to implement the Market Redesign and Technology Upgrade (“MRTU”) tariff, the Commission directed the CAISO to submit periodic reports, of specified form and content and also directed the CAISO to memorialize that form and content in its tariff.<sup>5</sup> Since MRTU the CAISO has submitted additional tariff amendments and, in some cases, the Commission established periodic informational reports but did not direct the CAISO to memorialize those obligations in its tariff. Through this motion, the CAISO seeks authorization to retire three legacy obligations established through Commission directive but not otherwise memorialized in the CAISO’s tariff.

The first legacy obligation the CAISO seeks to retire is the 120-day Exceptional Dispatch report.<sup>6</sup> Beginning with its Order issued in 2006, the

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set forth in Sections 7.7.6(d) and 34.11.4 of the CAISO Tariff. The CAISO has submitted Market Disruption reports into legacy MRTU Docket Nos. ER06-616 and ER07-1257 and has submitted Exceptional Dispatch reports into legacy MRTU Docket Nos. ER08-1178 and EL08-88. The CAISO has likewise included these legacy MRTU docket references in its companion filing, Docket No. ER24-2778.

<sup>4</sup> See e.g., *Cal. Indep. Sys. Operator Corp.*, 139 FERC ¶ 61,206, P 31 (2012) (granting relief for good cause shown where requirement was no longer necessary).

<sup>5</sup> See Companion Section 205 Submission, Docket Nos. ER08-1178, *et al* (Aug. 14, 2014).

<sup>6</sup> In the companion Section 205 filing, the CAISO seeks authorization to amend the form and content of Section 34.11 of the CAISO tariff. Section 34.11 implemented the Commission’s directive to submit a report, of specified form and content, for Exceptional Dispatches on a monthly basis. See Companion Section 205 Submission, Docket Nos. ER08-1178, *et al* (Aug. 14, 2014) (requesting relief from the monthly reporting requirement). The Commission also directed the continuation of the CAISO’s 120-day Exceptional Dispatch reporting, but did not direct the CAISO to memorialize the 120-day reporting requirement in its tariff. See *Cal. Indep.*

Commission directed the CAISO to issue periodic reports detailing the reasons for Exceptional Dispatch. These reports were tailored to allow the Commission, stakeholders, and all interested parties to monitor the manner in which the CAISO employs Exceptional Dispatch. Specifically, the Commission directed the CAISO to report the frequency, volume, costs, causes, and degree of mitigation of Exceptional Dispatch to ensure sufficient transparency into the CAISO's use of its tariff authority.<sup>7</sup> Although the Commission acknowledged the extensive burden, the Commission reasoned that stakeholders' need to access information sufficient to understand, evaluate, or propose solutions to the CAISO's use of Exceptional Dispatch was a stronger counterweight at that time.<sup>8</sup> Through its discussion of the reporting obligation in its Order, the Commission directed the CAISO to continue its 120-day reporting process while the CAISO worked towards achieving a monthly reporting process.<sup>9</sup> The 120-day Exceptional Dispatch report has been submitted as an information-only report for more than a decade.<sup>10</sup> At no time in the past decade has a party filed a motion or comment with the Commission after reviewing a CAISO 120-day Exceptional Dispatch

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*Sys. Operator Corp.*, 128 FERC ¶ 61,218 (2009) (directing 120-day Exceptional Dispatch reporting but without a directive to memorialize the compliance obligation in the tariff).

<sup>7</sup> *Id.* at P 263. The Commission acknowledged that Exceptional Dispatch is necessary to ensure reliable operations of the CAISO grid. *Id.*

<sup>8</sup> *Id.* As explained in the CAISO's companion Section 205 filing, the monthly requirement was memorialized in Section 34.11 of the tariff. See Companion Section 205 Submission, Docket Nos. ER08-1178, *et al* (Aug. 14, 2014) (proposing revisions to Section 34.11). The 120-day reporting obligation was never formally lifted and the CAISO has continued to submit this report.

<sup>9</sup> See *Cal. Indep. Sys. Operator Corp.*, 126 FERC at P 263; *Cal. Indep. Sys. Operator Corp.*, 128 FERC ¶ 61,218 (2009) (directing continuation of the 120-day Exceptional Dispatch report but not otherwise requiring the CAISO to memorialize such an obligation in its tariff).

<sup>10</sup> The CAISO intends the final 120-day Exceptional Dispatch report to be the report submitted on June 20, 2024 in Docket No. ER08-1178, *et al.*

report. Going forward, the CAISO will provide similar information through its website.<sup>11</sup>

The second legacy obligation the CAISO seeks to retire is the arises from the Commission's order accepting the CAISO's request to make permanent the maximum natural gas constraint in the Southern California Gas Company and San Diego Gas & Electric Company regions.<sup>12</sup> This constraint enables the CAISO to operate the system reliably when faced with natural gas limitations or restrictions in the southern region of the CAISO system.<sup>13</sup> The Commission directed the CAISO to continue submitting reports into the legacy docket "through such time as CAISO publishes an equivalent analysis on its website."<sup>14</sup> The CAISO has submitted these reports each year, including in years where the constraint was not enforced.<sup>15</sup> At no time has a party filed a motion or comment

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<sup>11</sup> The CAISO intends to include the information as part of its market reporting reports and/or forums. See, e.g., <https://www.caiso.com/library/market-performance-reports>; <https://www.caiso.com/library/market-performance-planning-forum>. The CAISO intends the June 2024 submission to be the final submission of the 120-day Exceptional Dispatch unless the Commission directs otherwise.

<sup>12</sup> See *Cal. Indep. Sys. Operator Corp.*, 169 FERC ¶ 61,253 (2019).

<sup>13</sup> *Id.* at PP 16-18 (explaining the manner in which the constraint allows the CAISO to respond to risks related to the Aliso Canyon storage facility).

<sup>14</sup> *Id.* at P 19.

<sup>15</sup> See, e.g., Annual Informational Report - Use of Maximum Gas Burn Constraint of the California Independent System Operator Corporation, Docket No. ER20-273 (June 28, 2024) (explaining the constraint was not enforced). During prior reporting periods, the constraint was enforced on a very limited basis. See, e.g., Annual Informational Report - Use of Maximum Gas Burn Constraint of the California Independent System Operator Corporation, Docket No. ER20-273 (June 29, 2023) (explaining that the constraint was enforced one time); Annual Informational Report - Use of Maximum Gas Burn Constraint of the California Independent System Operator Corporation, Docket No. ER20-273 (June 30, 2022) (explaining the constraint was enforced one time); Annual Informational Report - Use of Maximum Gas Burn Constraint of the California Independent System Operator Corporation, Docket No. ER20-273 (June 30, 2021) (explaining the constraint was enforced four times); Annual Informational Report - Use of Maximum Gas Burn Constraint of the California Independent System Operator Corporation, Docket No. ER20-273 (July 1, 2020) (explaining the constraint was enforced three times). The CAISO intends the June 2024 submission to be the final submission unless the Commission directs otherwise.

with the Commission after reviewing the constraint report. Going forward, the CAISO will provide this information through its website.<sup>16</sup>

The third and final report the CAISO seeks to retire relates to the CAISO's role as operator of the Western Energy Imbalance Market (WEIM), specifically as it relates to the implementation of the Available Balancing Capacity feature and the degree to which the feature mitigates the price spikes identified in 2014.<sup>17</sup> In its Order approving the Available Balancing Capacity feature, the Commission directed the CAISO to submit ongoing information reports "to help identify possible implementation or design issues not already apparent and provide transparency regarding the effectiveness of the proposal."<sup>18</sup> The CAISO implemented the ABC enhancement on March 23, 2016. Since this time, the CAISO has submitted reports of quarterly activity into the legacy docket, consistent with the Commission's directive to continue the submission of these reports "for a minimum of one year, until the Commission finds that the reports are no longer necessary."<sup>19</sup> At no time has a party filed a motion or comment with the Commission after reviewing the Available Balancing Capacity report. Going forward, the CAISO will continue to provide analysis on the benefits of

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<sup>16</sup> Going forward, the CAISO intends to include the information as part of its market reporting reports and/or forums. See, e.g., <https://www.aiso.com/library/market-performance-reports>; <https://www.aiso.com/library/market-performance-planning-forum>.

<sup>17</sup> See *Cal. Indep. Sys. Operator Corp.*, 153 FERC ¶ 61,305, P 99 (2015) (explaining the identified price spikes and the CAISO's proposed resolution).

<sup>18</sup> *Id.* at 25.

<sup>19</sup> The CAISO had intended to perform the analysis to support the information-only reports for only the first year following implementation. See, e.g., *id.* at P 99. The CAISO is submitting the final quarterly activity report in August 2024 and intends this to be the final submission, unless the Commission directs otherwise.

WEIM on the website and will be responsive to inquiries on the Available Balancing Capacity feature.<sup>20</sup>

## **II. MOTION FOR RELIEF FROM LEGACY REPORTING OBLIGATIONS**

The CAISO respectfully requests the Commission affirm the termination of any ongoing obligation to submit the three identified legacy reports through the eLibrary platform. The CAISO will continue to provide information on Exceptional Dispatch, the Max Gas Burn Constraint, and WEIM benefits within its established market reports and assessments.<sup>21</sup> This request is consistent with legislative goals of reducing the regulatory burden while still providing transparency.<sup>22</sup> Continuing to monitor, manage, and maintain these legacy dockets imposes oversight burden on the Commission.<sup>23</sup> Other than receipt of the CAISO's information-only reports, these legacy dockets have no ongoing or present activity. In light of the passage of time, the evolution of the CAISO's market analytics and reporting, the continued availability of CAISO market information in a modernized form through the CAISO website, and the administrative burden involved in generating these legacy reports for submission through eLibrary, the

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<sup>20</sup> The CAISO prepares quarterly benefit reports maintained on the Western Energy Markets website. See <https://www.westerneim.com/Pages/About/QuarterlyBenefits.aspx>.

<sup>21</sup> See, e.g., <https://www.caiso.com/library/market-performance-reports> (providing information on the CAISO markets); <https://www.caiso.com/library/market-performance-planning-forum> (same); <https://www.westerneim.com/Pages/About/QuarterlyBenefits.aspx> (providing information on the Western Energy Markets).

<sup>22</sup> See, e.g., PAPERWORK REDUCTION ACT, 44 U.S.C. §§ 3501 (recognizing that reporting does involve substantial costs and requiring federal agencies to strive to minimize the reporting burden and avoid duplicative reporting requirements).

<sup>23</sup> See, e.g., *Devon Power LLC*, 121 FERC ¶ 61,138 at P 23 (2007) (granting ISO-NE's request to cease submission of information-only reports that had become obsolete with the passage of time and the evolution of the organization).

CAISO submits that good cause exists for the Commission to terminate these three legacy reporting requirements.<sup>24</sup>

**A. The CAISO's exceptional dispatch reports have served their intended purpose and the CAISO will continue to make information about exceptional dispatches available.**

For more than a decade, the CAISO has submitted quarterly and monthly Exceptional Dispatch reports consistent with the Commission's prescribed form and content.<sup>25</sup> The CAISO and its stakeholders originally expected that use of the Exceptional Dispatch authority would be infrequent,<sup>26</sup> but the hundreds of reports submitted demonstrate that Exceptional Dispatch is a tool on which the CAISO relies to maintain reliable operations in numerous and varied scenarios in a manner that is acceptable to stakeholders. In addition to the monthly and quarterly reports, the CAISO submits into the legacy docket, the CAISO publishes on its website a monthly market performance report that highlights the frequency and cost of Exceptional Dispatch as a subset of a broader category of operator intervention,<sup>27</sup> as well as a Market Performance Metric Catalogue that

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<sup>24</sup> *Id.*

<sup>25</sup> See *Cal. Indep. Sys. Operator Corp.*, 128 FERC ¶ 61,218, PP 3-51 (prescribing the form and content for on-going reports), *on clarification*, *Cal. Indep. Sys. Operator Corp.*, 131 FERC ¶ 61,100 (2010) (providing necessary clarifications).

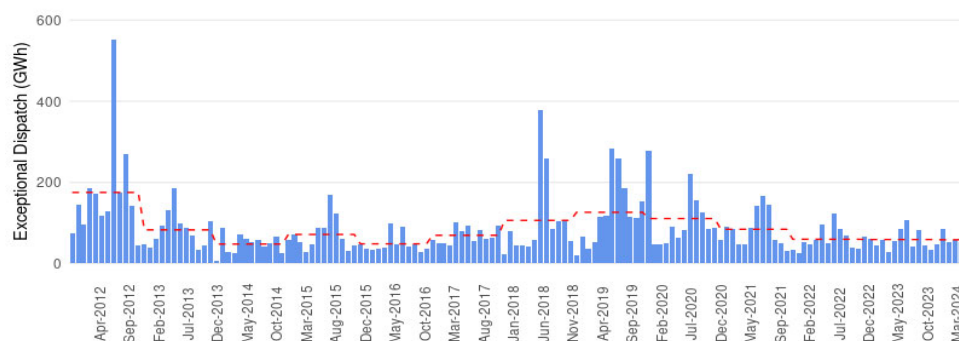
<sup>26</sup> See, e.g., *Cal. Indep. Sys. Operator Corp.*, 128 FERC at P 51 (explaining that the purpose of the on-going reporting requirement was designed consistent with "the Commission's expectation [ ] that the CAISO's stakeholder processes should move forward in assessing the reasons underlying exceptional dispatches and addressing what market products and/or solutions may be developed to limit the CAISO's reliance on Exceptional Dispatch to situations that are rare and infrequent or genuine emergencies").

<sup>27</sup> The monthly report is published approximately three weeks after the end of every month and is based on preliminary settlement data available about 10 days after the end of the month. These reports are accessible at the following page:  
<http://www.caiso.com/market/Pages/ReportsBulletins/Default.aspx>.

provides an explanation and context for each market metric, including Exceptional Dispatch.<sup>28</sup>

In 2009 the Commission directed the CAISO to continue the submission of reports, submitted on a rolling 120-day basis, describing the status of the CAISO's efforts to reduce the frequency of Exceptional Dispatch and of the CAISO's efforts to develop enhancements that would reduce reliance on Exceptional Dispatch.<sup>29</sup> The reports over the last fifteen years have demonstrated patterns and consistency in the manner in which the CAISO's utilizes its Exceptional Dispatch authority. The annual exceptional dispatch volumes have been decreasing since 2019 and have remained relatively stable at low levels for recent years. The volume of exceptional dispatches since the summer months have decreased as evident from the seasonal patterns every year. This is demonstrated by Figure 1.<sup>30</sup>

*Figure 1. Exceptional Dispatch Volume from January 2012 to May 2024*



<sup>28</sup> These catalogues are accessible at the following page:  
<http://www.caiso.com/market/Pages/ReportsBulletins/Default.aspx>.

<sup>29</sup> *Id.*

<sup>30</sup> Figure 1 was provided in the CAISO's most-recent 120-day Exceptional Dispatch report. See Exceptional Dispatch Report 120 Days for 02/01/2024 through 05/31/2024, of the California Independent System Operator Corporation, Docket No. ER08-1178, *et al.* (June 20, 2024).



At no time in the past decade has a party filed a motion or comment with the Commission after reviewing a CAISO 120-day Exceptional Dispatch report.<sup>31</sup>

Accordingly, the CAISO moves to retire this legacy report. For avoidance of doubt, the CAISO will continue to comply with the Commission's standard reporting format for out-of-market actions, including Exceptional Dispatch, and does not seek leave from the Commission's Order No. 844 reporting requirements.<sup>32</sup> In Order No. 844, the Commission reviewed the reporting practices of ISO/RTO regions and concluded that a uniform framework for reporting out-of-market actions was necessary to ensure just and reasonable rates.<sup>33</sup> While the CAISO initially opposed these requirements, believing its monthly and 120-day reporting cycle to be sufficient, the Commission found that the uniform reporting requirements were superior to the CAISO's legacy reporting requirements.<sup>34</sup> After retiring the 120-day Exceptional Dispatch report, the CAISO will continue to comply with the Commission's standard reporting

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<sup>31</sup> See, e.g., Docket No. ER08-1178 (demonstrating that no party has submitted comments in the past decade). In the latest effort to assess stakeholder feedback on the market policy initiatives CAISO should undertake, no stakeholder proposed measures to mitigate or reduce the occurrence of Exceptional Dispatches. Information of the CAISO's annual policy roadmap process and stakeholder recommendation is available on the CAISO's website: <https://stakeholdercenter.aiso.com/RecurringStakeholderProcesses/Annual-policy-initiatives-roadmap-process-2024>.

<sup>32</sup> See, e.g., *Uplift Cost Allocation and Transparency in Markets Operated by Regional Transmission Organizations and Independent System Operators*, 163 FERC ¶ 61,041 (2018) (Order No. 844) (requiring reporting of transactions, including Exceptional Dispatch).

<sup>33</sup> See Order No. 844 at P 27 (finding existing practices to be unjust and unreasonable) and P 30 (establishing the new just and reasonable rate and directing specific reporting requirements for each ISO/RTO); *Letter Order*, Docket No. ER18-2398 (Jan. 18, 2019) (accepting the CAISO's changes in compliance with Order No. 844).

<sup>34</sup> See Order No. 844 at P 28 (explaining that the CAISO's reporting practices, including the 120-day Exceptional Dispatch report, were inferior to the Order No. 844 requirements).

process, as it does today,<sup>35</sup> and will also maintain its Exceptional Dispatch disclosures through OASIS reporting, as it does today.<sup>36</sup> The CAISO will continue to issue its monthly market reports and will continue to conduct its quarterly market performance and planning forum, each of which provide stakeholders an opportunity to understand the drivers and the costs of Exceptional Dispatch.<sup>37</sup> These disclosures, together with the existing avenues for stakeholder engagement such as the market performance and planning forum and the stakeholder initiative process, provide stakeholders with avenues to obtain information about the cost, cause, or potential reduction in reliance on Exceptional Dispatch and forums in which to discuss such information.<sup>38</sup>

For these reasons, the CAISO respectfully requests the Commission grant the relief requested in this motion and terminate the legacy 120-day Exceptional Dispatch reporting requirement.<sup>39</sup>

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<sup>35</sup> See CAISO Tariff, Section 6.5.16. See also *Letter Order*, Docket No. ER18-2398 (Jan. 18, 2019) (accepting the CAISO's changes in compliance with Order No. 844).

<sup>36</sup> See [oasis.caiso.com](https://oasis.caiso.com) (allowing for generation of reports by date, instruction type, and TAC area by following the menu for "Energy" → "System" → "Exceptional Dispatch").

<sup>37</sup> See, e.g., <https://www.caiso.com/library/market-performance-reports> (providing information on Exceptional Dispatches within the monthly reports); <https://www.caiso.com/library/market-performance-planning-forum> (providing information on Exceptional Dispatches within the quarterly materials).

<sup>38</sup> In addition, and upon expression of sufficient interests, the CAISO can leverage other venues, as appropriate (e.g., regional issues forum, market surveillance committee, etc.).

<sup>39</sup> The CAISO's companion filing, submitted pursuant to Section 205, proposes tariff revisions to reduce the burden of the monthly reporting requirement and requests the Commission issue an order approving such revisions within sixty-days. See Companion Section 205 Submission, Docket Nos. ER08-1178, *et al* (Aug. 14, 2014).

**B. The CAISO's maximum gas constraint reports have served their intended purpose and the CAISO will continue to make information about the maximum gas constraint available**

When the CAISO initially proposed a temporary maximum gas constraint in 2016, the Aliso Canyon gas facility in Southern California posed identified risks to system reliability and presented market distortion risks.<sup>40</sup> In 2019 the CAISO sought to make the constraint permanent to address the continued risk of constrained gas system in Southern California.<sup>41</sup> The Commission approved the constraint but directed the CAISO to submit annual informational filings through eLibrary in the legacy docket until such time as the CAISO “publishes an equivalent analysis on its website, on the impacts of the maximum gas burn constraint on the CAISO markets and when the constraint is enforced.”<sup>42</sup> The CAISO has submitted annual informational filings as directed by the Commission, documenting that the constraint is used on a very limited basis.<sup>43</sup>

Through this motion, the CAISO affirms that any year in which it enforces the maximum gas burn constraint it will make available on its website, (i)

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<sup>40</sup> See *Cal. Indep. Sys. Operator Corp.*, 169 FERC ¶ 61,253, PP 2-4 (2019).

<sup>41</sup> *Id.* at PP 5-7.

<sup>42</sup> *Id.* at P 19.

<sup>43</sup> See Annual Informational Report - Use of Maximum Gas Burn Constraint of the California Independent System Operator Corporation, Docket No. ER20-273 (June 28, 2024) (explaining the constraint was not enforced). During prior reporting periods, the constraint was enforced on a very limited basis. See, e.g., Annual Informational Report - Use of Maximum Gas Burn Constraint of the California Independent System Operator Corporation, Docket No. ER20-273 (June 29, 2023) (explaining that the constraint was enforced one time); Annual Informational Report - Use of Maximum Gas Burn Constraint of the California Independent System Operator Corporation, Docket No. ER20-273 (June 30, 2022) (explaining the constraint was enforced one time); Annual Informational Report - Use of Maximum Gas Burn Constraint of the California Independent System Operator Corporation, Docket No. ER20-273 (June 30, 2021) (explaining the constraint was enforced four times); Annual Informational Report - Use of Maximum Gas Burn Constraint of the California Independent System Operator Corporation, Docket No. ER20-273 (July 1, 2020) (explaining the constraint was enforced three times).

information on instances when the gas nomogram is enforced, (ii) gas system conditions when constraint is enforced, and (iii) inputs or information used in shaping the maximum gas burn limits under the nomogram.<sup>44</sup>

For these reasons, the CAISO respectfully requests the Commission authorize the CAISO to retire its maximum gas burn constraint report for good cause shown.

**C. The CAISO's Available Balancing Capacity reports have served their intended purpose and the CAISO will continue to make information available**

The CAISO implemented the Available Balancing Capacity feature in March 2016. The Available Balancing Capacity feature enhanced the WEIM so that the market systems automatically recognize and account for capacity a WEIM entity has available to maintain reliable operations in its own balancing authority area (BAA), but has not been bid into the WEIM. Since implementation, the CAISO has made quarterly reports of Available Balancing Capacity to provide transparency into the Available Balancing Capacity feature's resolution of the

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<sup>44</sup> The CAISO intends to include this disclosure as part of the quarterly Market Performance and Planning Forum materials if the constraint is enabled. See <https://www.caiso.com/library/market-performance-planning-forum> (providing exemplars of quarterly materials and analysis that will include the maximum gas burn constraint on a going-forward basis, if that constraint is enabled).

identified price spikes.<sup>45</sup> At no time has a party filed a motion or comment with the Commission on such reports.<sup>46</sup>

The CAISO has submitted quarterly reports into the legacy docket for more than eight years, without contention. The Commission directed that the reports be submitted “until the Commission finds that the reports are no longer necessary.”<sup>47</sup> Given the manner in which the Available Balancing Capacity feature has operated since implementation, and the lack of concerns expressed by market participants and stakeholders, the CAISO respectfully requests the Commission affirm the Available Balancing Capacity report is no longer necessary. The CAISO will continue to analyze, and report, the WEIM benefits and will be responsive to inquiries on the Available Balancing Capacity feature.<sup>48</sup>

### **III. CONCLUSION**

Good causes exists to grant this motion and terminate the legacy obligation for the CAISO to submit through eLibrary information-only (1) 120-day Exceptional Dispatch reports, (2) Maximum Gas Burn Constraint reports, and (3) Available Balancing Capacity reports. Terminating the CAISO's obligation to continue submitting these reports into the legacy dockets maintained by the

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<sup>45</sup> Specifically, the CAISO provides on the performance of the Available Balancing Capacity feature and includes the same information the CAISO provides in its monthly transitional period report submitted during a WEIM entity's first six-month transition period. See, e.g., Western Energy Imbalance Market January 1 – March 31, 2023 Available Balancing Capacity Report, Docket No. ER15-861 (Apr. 20, 2023) (explaining the data provided). Going forward, the CAISO does not intend to replicate the Available Balancing Capacity reports but will remain responsive to inquiries on the Available Balancing Capacity feature.

<sup>46</sup> See Docket No. ER20-273 (listing all CAISO reports of quarterly activity but not providing any responsive entries).

<sup>47</sup> See *Cal. Indep. Sys. Operator Corp.*, 153 FERC ¶ 61,305, P 99 (2015).

<sup>48</sup> The CAISO prepares the WEIM benefits reports, published on a quarterly basis. See <https://www.westerneim.com/Pages/About/QuarterlyBenefits.aspx>.

Commission will reduce regulatory, administrative, and oversight burden. The CAISO will continue to provide information on Exceptional Dispatch, the Maximum Gas Burn Constraint, and WEIM benefits through its website.

**/s/ Heather Curlee**

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Counsel for the California Independent  
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Dated: August 14, 2024

### **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 14<sup>th</sup> day of August, 2024.

/s/ Jacqueline Meredith

Jacqueline Meredith

An employee of the California ISO