



August 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
Corrected Response to Deficiency Letter
Docket No. ER04-835-010**

Dear Secretary Bose:

On June 22, 2020, the CAISO submitted a filing containing the additional information required by the Commission's May 21, 2020 deficiency letter in this proceeding (Deficiency Letter Response). The CAISO subsequently discovered that the interest rate for the second quarter of 2016 that the CAISO used to prepare the interest invoicing table provided in Attachment B to the Deficiency Letter Response (Attachment B) was different from the Commission interest rate for that quarter.¹ Therefore, the CAISO now submits a corrected version of Attachment B. The CAISO apologizes for any confusion it may have caused.

For the same reasons explained in the Deficiency Letter Response,² the CAISO respectfully requests privileged treatment for the entirety of corrected Attachment B pursuant to 18 C.F.R. § 388.112. The CAISO is providing both a public (redacted) and a privileged (unredacted) version of corrected Attachment B.³ As explained in the Deficiency Letter Response, the CAISO also requests

¹ Attachment A-1 to the Deficiency Letter Response listed the correct Commission interest rate for the second quarter of 2016 (*i.e.*, 3.46 percent). See <https://www.ferc.gov/enforcement-legal/enforcement/interest-rates>. However, the CAISO mistakenly applied to that quarter the interest rate for the first quarter of 2016 (*i.e.*, 3.25 percent) in performing the calculations that resulted in the interest amounts shown in Attachment B.

² See Deficiency Letter Response at 4.

³ The May 21, 2020 deficiency letter directed the CAISO to provide the data contained in Attachment B to enable the Commission to process the compliance filing the CAISO submitted on October 28, 2019 (as subsequently amended). The CAISO did not provide parties with unredacted copies of Attachment B because it contains confidential customer data. However, the CAISO provided all parties with their individual interest calculations in conjunction with the June

that the Commission waive the requirements of 18 C.F.R. § 388.112(b) to the extent they would otherwise require the CAISO to submit a form of non-disclosure agreement in this proceeding.

Please contact the undersigned with any questions.

Respectfully submitted,

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22, 2020 submission, and will also provide all parties with their corrected interest calculations in conjunction with the instant filing. Also, as the CAISO explained on page 2 of the answer it filed in this proceeding on July 24, 2020, it will issue invoices reflecting the interest amounts after the Commission authorizes the CAISO to resume invoicing.

Attachment B – Public Version

PRIVILEGED INFORMATION OMITTED PURSUANT TO 18 C.F.R. §388.112

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Docket No. ER04-835-010

California Independent System Operator Corporation

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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 10th day of August, 2020.

/s/ Daniel Klein
Daniel Klein
Davis Wright Tremaine LLP