

ISO 60-Day Compliance Matrix

#	FERC ORDER	FERC INSTRUCTION	Response/Tariff Section Modified	Filing/ Posting
1.	<p>October 30, 1997, 81 FERC ¶ 61,222 (“October 30 Order”) Staging Plan Section (beginning at 61,442)</p> <p>81 FERC at 61,444</p>	<p>ISO directed to delete from Tariff and related agreements all provisions not intended to be effective when the ISO commences operations and directed to file at least 60 days prior to effective date, under section 205, provisions for which implementation has been staged.</p>	<p>Staged provisions removed from tariff and related agreements.</p>	<p>November 21, 1997 205 filing/ December posting.</p>
2.	<p>October 30 Order, 81 FERC, ISO Principles Section (beginning at 61,446)</p> <p>81 FERC at 61,452</p>	<p>ISO must remove the residency requirement from its Bylaws.</p>	<p>Changes on hold pending resolution of Bylaw issues; a 90-day extension of time is being requested.</p>	
3.	<p>October 30 Order, 81 FERC at 61,453</p>	<p>ISO Bylaws must be modified to remove the continuing Oversight Board functions, consistent with November 26 Order</p> <p>[ISO directed to provide governance and dispute resolution procedures that do not involve the Oversight Board in November 26 Order, 77 FERC at pp. 61,817-18.]</p>	<p>Changes on hold pending resolution of Bylaw issues; a 90-day extension of time is being requested.</p>	

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4.	October 30 Order, 81 FERC at 61,454 n.108	ISO directed to include a clean (no blacklined) version of the ISO Bylaws in its compliance filing.	Changes on hold pending resolution of Bylaw issues. (See Items 2 and 3, above, and 46, below.)	
5.	October 30 Order, 81 FERC at 61,455	ISO directed to revise the Governors Code of Conduct to require that each Governor file a publicly available annual disclosure statement that identifies all of his/her investments in Market Participants, broken down by ISO Governing Board class structure.	Changes made.	
6.	October 30 Order, 81 FERC at 61,455	ISO directed to modify its Code of Conduct for employees so that all ISO employees must divest themselves of all securities issued by a Market Participant within six months of that person becoming an employee of the ISO (or six months from the date of this order for existing employees).	Changes made.	
7.	October 30 Order, 81 FERC at 61,457	ISO directed to add phrase to both Sections 2.3.3.4 and 2.3.3.9.1 “consistent with Section 2.3.3.1.”	Sections 2.3.3.4 and 2.3.3.9.1	Originally made in December posting p. 34 and 37. See also April posting at pp. 36 and 40.
8.	October 30 Order, 81 FERC at 61,457	ISO directed to add additional sentence to ISO Tariff Section 2.3.3.5 regarding advance notice for maintenance outages.	Section 2.3.3.5	Originally made in December posting p. 34. See also April posting at p. 37.

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9.	October 30 Order, 81 FERC at 61,457	ISO directed to revise the parenthetical phrase in Section 2.3.5.1.3 to read, "or more stringent criteria as the ISO may impose pursuant to Section 2.3.1.3.2."	Section 2.3.5.1.3 modified.	Originally made in December posting p. 40. See also April posting at p. 44.
10.	October 30 Order, 81 FERC, Existing Contracts Section (beginning at 61,463) 81 FERC at 61,471	ISO directed to revise Section 2.4.4.4.3 of ISO Tariff to remove provision regarding denying Non-Converted Rights holders the opportunity (flexibility) to exercise their within-the-hour scheduling rights under Existing Contracts.	Modified section (also see SP Protocol).	Originally made in December posting p. 48 and Appendix L, beginning at p. 557. See also April posting at p. 53 and Appendix L at p. 600.
11.	October 30 Order, 81 FERC, ISO Tariff/ Congestion Management. Section (beginning at 61,474) 81 FERC at 61,478	ISO directed to file specific practices and procedures, including cost calculations, that the ISO will use on the ISO Operations Date to resolve Intra-Zonal Congestion. ISO directed to modify Tariff to incorporate these changes.	ISO currently only manages Intra-Zonal Congestion in real-time. See Sections 7.2.6.2, 7.2.6.3 and DP 7.4 and 8.4.	Originally made in December posting pp. 168, 442 and 444. See also April posting at pp. 179, 479 and 480.

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12.	October 30 Order, 81 FERC at 61,478	ISO must delete Tariff Sections 2.5.22.8, 7.2.1.4.2, 7.2.4.1.3, 7.2.6.1, 7.2.6.1.1 through 7.2.6.1.6, 7.3.2 and 7.3.2.1 (sections regarding Intra-Zonal Congestion not in effect on ISO Operations Date).	As noted above, the ISO currently manages Intra-Zonal Congestion only in real-time. The Grid Operations Charge outlined in Section 7.3.2 is necessary to recover these real-time costs. Consequently, Sections 2.5.22.8, 7.2.1.4.2 and 7.3.2 should not be deleted. In addition, Section 7.3.1.4 needs to be modified to delete provisions not applicable on the ISO Operations Date.	Originally reflect in December posting at pp. 91, 162, 164, 168, 175. See also April posting at pp. 97, 173, 174, 178, 188. Modification to Section 7.3.1.4 included in compliance Tariff at p. 181.
13.	October 30 Order, 81 FERC at 61,478	ISO directed to file all Intra-Zonal Congestion Management protocols, at the time the tariff provisions are refiled.	To be filed when staged aspects of Inter-Zonal Congestion Management are implemented (See items above).	

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#	FERC ORDER	FERC INSTRUCTION	Response/Tariff Section Modified	Filing/ Posting
14.	October 30 Order, 81 FERC at 61,478	ISO required to permit a participant to submit Ancillary Services bids and Adjustment Bids for the same capacity in the Day-Ahead and Hour-Ahead Markets.	As discussed in Amendment No. 6, the ISO currently permits participants to submit bids in this fashion and Section 26.2 of the ISO Tariff waives any charges that would be incurred under Section 2.5.26 of the Tariff. The ISO is currently evaluating the necessary software changes to permanently implement this requirement. The ISO has included this item in its revised Staging Plan 4.	To be included in Revised Staging Plan 4 to be filed at the end of June, 1998.
15.	October 30 Order, 81 FERC at 61,479	<p>ISO should revise its Tariff to reflect a change that the procedure utilized for the Congestion Management market is the same procedure as used for the Ancillary Services. Auction process, i.e. more than one bid for the same sequentially ordered capacity.</p> <p>If unable to implement by ISO Operations Date, the ISO should indicate why implementation must be delayed and at what date it expects to implement the change.</p>	(See response to Item 14.)	To be included in Revised Staging Plan 4 to be filed at the end of June, 1998.

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#	FERC ORDER	FERC INSTRUCTION	Response/Tariff Section Modified	Filing/ Posting
16.	October 30 Order, 81 FERC at 61,479	ISO required to announce additional information about Advisory Redispatch, consistent with Day-Ahead information identified in Section 6.1.2.2.2, to be posted on WEnet (ISO Home Page).		To be included in Revised Staging Plan 4 to be filed at the end of June, 1998.
17.	October 30 Order, 81 FERC at 61,479	ISO directed to incorporate sections equivalent to (v) and (vi) into the Appendix A Master Definition of Adjustment Bid (that clarifies the form of an Adjustment Bid that a load would submit).	Definition modified.	Originally made in December posting pp. 253-254.
18.	October 30 Order, 81 FERC at 61,479	ISO directed to make publicly available the algorithm that it uses to manage Inter-Zonal Congestion.	A description of the algorithm will be posted on the ISO Home Page. The model and software are proprietary information.	To be reflected in posting of compliance filing.
19.	October 30 Order, 81 FERC at 61,480	ISO directed to modify the Tariff to explicitly state the process by which Adjustment Bids left standing after the close of the Hour-Ahead market become Supplemental Energy bids in the balancing market.	Adjustment Bids do not become Supplemental Energy bids in the ISO market structure (as explained in the first paragraph of SBP 4).	
20.	October 30 Order, 81 FERC, Tariff/ Congestion Zones Section (beginning at 61,482) 81 FERC at 61,484	ISO directed to modify the definition of Grid Operations Charge so that it is consistent with ISO Tariff provisions (i.e. 7.3.2) pertaining to the calculation/assignment of Intra-Zonal Congestion costs.	Modified Section 7.3.2.	Originally reflected in December posting at p. 175. See also April posting at p. 188.

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#	FERC ORDER	FERC INSTRUCTION	Response/Tariff Section Modified	Filing/ Posting
21.	October 30 Order, 81 FERC at 61,484-485	ISO directed to amend the ISO Tariff to specify (1) timing for resolving Inter-Zonal Congestion between Inactive and Active Zones (i.e. process occurs when? before/after/simultaneously with?) and (2) the manner in which the associated costs are calculated.	The ISO does not resolve or charge for Inter-Zonal Congestion between Active and Inactive Zones.	
22.	October 30 Order, 81 FERC at 61,485	ISO directed to clarify the procedures that will be used when allocating transmission capacity on a pro-rata basis (i.e. will ISO maintain balanced Schedules for each SC when it reduces SC's Generation due to insufficient transmission capacity).	Modified Scheduling Protocol section 10.2.	Originally reflected in December posting at pp. 595-596. See also April posting at pp. 642-643.
23.	October 30 Order, 81 FERC, Tariff/ Transmission Expansion Section (beginning at 61,486) 81 FERC at 61,489	ISO ordered to delete prescriptive phrase in Section 3.2.7.3, "(calculated on the basis...such Wheeling Revenues are attributable)."	Modified section.	Originally reflected in December posting at p. 126. See also April posting at pp. 133-134.

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#	FERC ORDER	FERC INSTRUCTION	Response/Tariff Section Modified	Filing/ Posting
24.	<p>October 30 Order, 81 FERC, Tariff/ Ancillary Services Section (beginning at 61,489)</p> <p>81 FERC at 61,493</p>	<p>(a) ISO directed in its compliance filing to explain why it must stage Ex Post price to compensate Ancillary Services providers for Imbalance Energy.</p> <p>(b) ISO directed to delete posted Tariff provisions regarding compensation for Imbalance Energy that will not be in effect on ISO Operations Date.</p> <p>[ISO will file to implement compensation 60 days before it is ready to implement this provision.]</p>	<p>(a) Added Section 23.</p> <p>(b) Amendment No. 6 modified Section 2.5.23. See Section 23.2.1 in the April posting.</p>	<p>(a)-(b): These items are no longer staged. As provided in Amendment 6, the ISO utilizes a new adjustable BEEP interval, currently set at 10 minutes. See Amendment No. 6 Attachment A at pp. 1-26.</p>

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#	FERC ORDER	FERC INSTRUCTION	Response/Tariff Section Modified	Filing/ Posting
25.	October 30 Order, 81 FERC at 61,494	ISO directed to modify its Tariff so that SCs will pay the additional costs of Ancillary Services caused by real time changes in their Demand (relative to scheduled demand). This directive pertains to the use of Metered Demand versus Scheduled Demands.	The ISO currently utilizes metered Demands for determining the costs paid by SCs for Black Start and Voltage Support services. The remaining AS are paid based on scheduled Demand. Use of Metered Demand for Replacement Reserves is already included in Revised Staging Plan 4. The ISO will initiate a stakeholder process to evaluate the use of metered Demands for Spinning, Non-Spinning and Regulation services. This subject is highly technical and would require substantial software revisions which may be costly.	Stakeholder process will be added to the Revised Staging Plan 4 to be filed at the end of June, 1998.
26.	October 30 Order, 81 FERC at 61,495	ISO directed to replace the phrase "FERC-jurisdictional utilities" in Section 2.5.7.3 with "public utilities under the FPA."	Modified section.	Originally reflected in December posting p. 64. See also April posting at p. 69.

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27.	October 30 Order, 81 FERC 61,496	ISO required to reflect clarifications recommended by BPA (BPA at 17) relating to Sections 2.5.16 and 2.5.17 and the definition of Non-Spinning Reserves contained in the ISO Tariff.	Sections 2.5.16 and 2.5.17 are modified. Item in Staging Plan 3 has been completed. Definition of Non-Spinning Reserves not amended because definition already takes into account time needed to synchronize.	Included in compliance Tariff at pp. 75-80.
28.	October 30 Order, 81 FERC at 61,499	(a) ISO required to notify FERC via its Staging Plan reports on the status of its electronic dispatch capabilities. (b) To the extent the ISO is unable to perform this function at ISO Operations Date, ISO directed to permit the dispatch of all Ancillary Services resources by phone or fax.	(a) No further compliance action required. (b) Sections 2.5.6.2 and 2.5.22.10 have been modified.	(a) Originally filed in Staging Plan 1 on November 21, 1997. Revised Staging Plan 4 to be filed at the end of June, 1998. (b) Included in compliance Tariff at pp. 64-65 and 95.
29.	October 30 Order, 81 FERC, Tariff/ Access Charge Section (beginning at 61,500) 81 FERC at 61,505	ISO should modify Section 7.1.3 of the Tariff to state that to the extent a TO has existing transmission service contracts for the delivery of its power requirements, that TO has satisfied the Self-sufficiency test until such time as those contracts have been terminated.	Modified section.	Originally reflected in December posting at p. 155. See also April posting at p. 164.

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#	FERC ORDER	FERC INSTRUCTION	Response/Tariff Section Modified	Filing/ Posting
30.	October 30 Order, 81 FERC, Tariff/ Scheduling Practices and Procedures Section (beginning at 61,506) 81 FERC at 61,509-510)	ISO directed to revise Section 2.2.6.4 of the Tariff regarding Inter-Scheduling Coordinator Trades (specific language included).	Modified section. Proposed language differs slightly from directive in order to refer to ISO Protocols.	Originally reflected in December posting at p. 12. See also April posting at pp. 12–13.
31.	October 30 Order, 81 FERC at 61,510	ISO should amend Sections 2.5.20.1 and 2.5.28 to provide that an SC's Operating Reserve requirement be reduced by the amount of system firm capacity purchased from outside the ISO Control Area consistent with WSCC standards.	Section 2.5.20.1 modified (Section 2.5.28 modified to cross-reference to Section 2.5.20.1).	Originally reflected in December posting at pp. 79-80. See also April posting at pp. 85-86.
32.	October 30 Order, 81 FERC at 61,510	ISO directed to add a subpart (f) to Section 2.5.20.7 (specific language given). [Note: posting no longer includes subpart (e). Unnecessary since Ancillary Services procured on a zonal basis.]	New subpart (e) added to Section 2.5.20.7.	Included in compliance Tariff at p. 86.
33.	October 30 Order, 81 FERC, Other Tariff Issues Section (beginning at 61,510) 81 FERC at 61,512	ISO required to amend Section 2.3.3.5.3 to allow an operator to request an after-the-fact explanation of ISO instructions.	Modified section.	Originally reflected in December posting at p. 35. See also April posting at p. 38.

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#	FERC ORDER	FERC INSTRUCTION	Response/Tariff Section Modified	Filing/ Posting
34.	October 30 Order, 81 FERC at 61,513	<p>ISO directed to file a proposal for establishing the Administrative Price to become effective when ISO operations commence.</p> <p>(See Section 2.3.2, et seq.)</p>	<p>In Amendment No. 6 the ISO modified Section 2.3.2 to clarify the circumstances under which the ISO will declare a system emergency. This change modified the conditions under which the ISO will impose an Administrative Price. Section 2.3.2.3.3, which clarifies how the Administrative Price will be established, is further modified to clarify how Congestion charges will be assessed.</p>	<p>Included in compliance Tariff at pp. 29-31.</p>
35.	October 30 Order, 81 FERC at 61,516	<p>ISO directed to clarify the Tariff provisions (i.e. 10.2.4 and 10.6.6.2 -- regarding grandfathering End-Use meters of ISO metered entities and SCs) with PG&E's suggested language.</p>	<p>Modified sections.</p>	<p>Originally reflected in December posting at p. 183 and 192. See also April posting pp. 197-198 and pp. 206-207.</p>
36.	October 30 Order, 81 FERC at 61,516	<p>ISO required to provide definitions of new terms identified by Turlock (ISO Metered Entity and Scheduling Coordinator Metered Entity).</p>	<p>New defined terms added.</p>	<p>Originally reflected in December posting at pp. 282 and 309. See also April posting p. 324 and 347.</p>

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#	FERC ORDER	FERC INSTRUCTION	Response/Tariff Section Modified	Filing/ Posting
37.	October 30 Order, 81 FERC at 61,516	ISO directed to make conforming changes to Tariff [Sections 10.2.5 and 5.2.3.1 – see SoCal Edison comment/language] regarding permitting ISO Metered Entities to access the ISO administered system database for meter data as suggested by SoCal Edison.	Currently, due to software limitation and security considerations, only one SC has access to a particular entity's meter data. However, the PX posts and disseminates all meter data information to the PX Participants, which should address Edison's concerns and provide Edison with the requisite data.	Revised Staging Plan 4 to be filed at the end of June 1998.
38.	October 30 Order, 81 FERC at 61,516	ISO directed to conform definition of Uncontrollable Forces in Master Definitions to match the first paragraph of section 15 of the Tariff.	Definition section modified.	Originally reflected in December posting in pp. 319-320. See also April posting at pp. 355-356. Included in compliance Tariff at p. 356.
39.	October 30 Order, 81 FERC at 61,517	ISO should amend definition of Tie-Point Meter to recognize the meters located at an ISO/UDC boundary.	Definition section modified.	Originally reflected in December posting at pp. 315-316. See also April posting at p. 352.
40.	October 30 Order, 81 FERC at 61,517	ISO (as well as PG&E and Oakland) directed to clarify the status of the 115kV line on the ISO Register.	The referenced 115kV line has been deleted from the ISO Register.	

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#	FERC ORDER	FERC INSTRUCTION	Response/Tariff Section Modified	Filing/ Posting
41.	<p>October 30 Order, 81 FERC, Tariff/ Liability Section (beginning at 61,517)</p> <p>81 FERC at 61,520</p>	<p>(a) ISO should modify Section 14.3 of the ISO Tariff by adding the words “or intentional wrongdoing” after the word “negligence.”</p> <p>(b) ISO should modify Section 14.3 of the ISO Tariff by adding the phrase, “to the extent permitted by law.”</p>	<p>(a) Modified section.</p> <p>(b) Modified section.</p>	<p>Originally reflected in December posting at p. 238. See also April posting p. 254.</p>
42.	<p>October 30 Order, 81 FERC at 61,520</p>	<p>ISO directed to modify Sections 14.1 and 14.2 so not to provide any limitation on liability of the ISO in cases of its negligence or intentional wrongdoing.</p>	<p>Modified section.</p>	<p>Originally reflected in December posting at p. 238. See also April posting at p. 254.</p>
43.	<p>October 30 Order, 81 FERC, Tariff/ Transmission Losses Section (beginning at 61,520)</p> <p>81 FERC at 61,522</p>	<p>ISO directed to delete portion of Section 7.4.3 that would allow the ISO to recalculate ex Post GMM because the ISO was not intending to implement on ISO Operations Date.</p>	<p>Modified section.</p>	<p>Originally reflected in December posting at p. 177. See also April posting at p. 190.</p>

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#	FERC ORDER	FERC INSTRUCTION	Response/Tariff Section Modified	Filing/ Posting
44.	<p>October 30 Order, 81 FERC, Tariff/ Overgeneration Section (beginning at 61,523)</p> <p>81 FERC at 61,526</p>	<p>ISO required to modify its treatment of Overgeneration as follows:</p> <p>(a) ISO directed to modify the ISO Tariff to require all SCs to individually resolve problems of excess Generation due to their obligations with respect to Regulatory Must-Run and Regulatory Must-Take Generation according to their own procedures and submit Balanced Schedules to the ISO in the Day-Ahead Market. (Footnote 468: requirement would not apply to Intra-Zonal Congestion nor to Reliability Must-Run Generation.)</p> <p>(b) ISO directed to remove the Overgeneration procedures from the ISO Tariff, since it is a problem that must be handled by SCs.</p>	<p>The ISO has removed the Overgeneration provisions from the Tariff. However, in Amendment No. 6, the ISO added provisions which pertain to resolving Overgeneration in real-time (as opposed to Day-Ahead and Hour-Ahead). This is appropriate since the ISO requires procedures to manage any Overgeneration resulting from real-time deviations from Schedules. SCs do not have the ability to submit Schedules in real-time and therefore cannot resolve Overgeneration.</p> <p>(a) Modified Sections: 2.2.7.2, 2.3.4 and SP 3.2.</p> <p>(b) See above.</p>	<p>(a) Originally reflected in December posting at pp. 13, 38-39 and Appendix L at pp. 565-571. See also April posting at pp. 14, 41-43 and Appendix L pp. 609-617.</p> <p>(b) See above.</p>

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45.	<p>October 30 Order, 81 FERC, Monitoring Section (beginning at 61,548)</p> <p>81 FERC at 61,552-61,553</p>	<p>ISO directed to revise its monitoring plan posted on WEnet (the ISO Home Page) with changes below prior to ISO Operations Date:</p> <p>(a) ISO directed to file its own plan (separate from PX) with details of its scope, data, reports, enforcement, and proposed interaction with the PX.</p> <p>(b) ISO should post on WEnet (ISO Home Page) a detailed description of the modified monitoring criteria and standards as they are developed.</p> <p>(c) ISO directed to include its monitoring plan in its Tariff.</p>	<p>(a) Market Monitoring & Information Plan (MMIP) filed October 31, 1997.</p> <p>(b) MMIP posted.</p> <p>(c) MMIP included in Appendix L.</p> <p>(See Schedule B for a detailed explanation of the ISO's compliance with respect to monitoring.)</p>	<p>(a)-(c): Originally reflected in December posting at Appendix L, MMIP pp. 458-480. See also April posting, Appendix L, MMIP pp. 495-517.</p>

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#	FERC ORDER	FERC INSTRUCTION	Response/Tariff Section Modified	Filing/ Posting
46.	October 30 Order, 81 FERC at 61,552	ISO directed to clarify its Bylaws when refiled to incorporate the institutional aspects of the monitoring plan.	The ISO presumes the Commission is referring to the proposed creation of the Market Surveillance Unit of the ISO. The ISO's Bylaws do not provide any outline of the organizational structure of the ISO except for the Governing Board, Officers and certain standing and advisory Governing Board Committees. The Market Surveillance Unit does not fall under any of those areas. Therefore the ISO does not believe that changes are necessary to the Bylaws. Accordingly, further guidance is being requested.	
47.	October 30 Order, 81 FERC TCA Section (beginning at 61,558) 81 FERC at 61,567-61,568	ISO directed to propose suitable language (preserving the tax-exempt status of municipal debt) in its ISO Tariff compliance filing that addresses, to the extent possible, the issues raised by LADWP, TANC, NCPA, Modesto and CMUA.	Issue under discussion with interested parties; a 90-day extension of time is being requested to permit resolution.	

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48.	<p>December 17, 1997, 81 FERC ¶ 61,320 (December 17 Order)</p> <p>81 FERC at 62,471 & 62,477</p>	<p>ISO must immediately conform its filed Protocols with the ISO Tariffs consistent with this and previous orders and post them on publicly accessible portion of WEnet (ISO Home Page). ISO required to file, under Section 205, its complete Protocols within sixty days of the ISO Grid Operations Date.</p>	<p>Protocols modified.</p>	<p>Originally reflected in December posting, Appendix L beginning at p. 353. See also April posting, Appendix L, beginning at p. 389.</p>
49.	<p>December 17 Order, 81 FERC at 62,470 and 62,476</p>	<p>ISO required to promptly post the ISO Tariff (& Protocols) Amendments (filed for informational purposes), including modifications ordered, on WEnet (ISO Home Page) and to make its compliance filing not later than 60 days after the commencement of ISO Operations.</p>	<p>ISO Tariff and Protocols, with the amendments incorporated, have been posted.</p>	<p>Originally reflected in December posting.</p>
50.	<p>December 17 Order, 81 FERC at 62,476</p>	<p>ISO required to modify Sections 2.5.19 and 2.5.10 of the ISO Tariff as proposed by Edison (relating to selling of Ancillary Services, specifically Black Start service).</p>	<p>Modified Section 2.5.19. (Section 2.5.10 not modified because the Section does not affect the selling of Black Start services.) (See also Section 5.10.5, which was modified consistent with this instruction.)</p>	<p>Originally reflected in December posting at p. 79. See also April posting p. 84. (See also Section 5.10.5, December posting at p. 147, April posting at p. 156.)</p>
51.	<p>December 17 Order, 81 FERC at 62,476-62,477</p>	<p>ISO directed to revise Section 2.5.7.4 to clearly state that Scheduling Coordinators may utilize transmission service under Existing Contracts to self provide A.S., where technically feasible and consistent with WSCC standards.</p>	<p>Modified section (see also ASRP 4.4.1 and 4.5.4).</p>	<p>Originally reflected in December posting at p. 65 and Appendix L, pp. 366-367. See also April posting at p. 70 and Appendix L at pp. 402-403.</p>

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52.	<p>December 17 Order 81 FERC at 62,471-474</p>	<p>ISO is directed to make generic and specific changes to Pro Forma Agreements and refile these agreements within 60 days after commencement of ISO operations.</p>	<p>Amendments to Pro Forma Agreements have been completed.</p>	<p>March posting.</p>
53.	<p>February 25, 1998, 82 FERC ¶ 61,174 (Agreements)</p> <p>82 FERC at 61,621 and 61,625</p> <p>82 FERC at 61,622</p> <p>82 FERC at 61,623</p> <p>82 FERC at 61,621</p>	<p>This order addresses agreements filed with FERC: PGAs, RPTOs and ICAAs.</p> <p>(a) ISO directed to modify the SCAs at issue (the pro forma of which is appended to the ISO Tariff), to comply with the December 17 order, post it on the WEnet (ISO Home Page) and file them within 60 days of operations.</p> <p>(b) ISO directed to revise PGAs to conform to the December 17th Order and file within 60 days of operations date. (See Schedule A for list of the PGAs.)</p> <p>(c) ISO directed to revise RPTO Agreements to conform to the December 17th Order and file within 60 days of operations date. (See Schedule A for list of the RPTO Agreements.)</p> <p>(d) ISO directed to revise SCAs to conform to the December 17th Order and file within 60 days of operations date. (See Schedule A for list of the SCAs.)</p>	<p>(a) – (d) Amendments have been drafted for all agreements. Most amendments have been sent to the other party.</p>	<p>Modified pro forma Agreements are posted on ISO Home Page.</p>

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54.	<p>February 25, 1998, 82 FERC ¶ 61,180 at 61,670-671</p> <p>82 FERC at 61,671</p>	<p>ISO directed to revise UDC Agreements to conform to the December 17th Order and file within 60 days of operations date. (See Schedule A for list of UDC Agreements.)</p> <p>ISO directed to revise Black Start Agreement to conform to the December 17th Order and file within 60 days of operations date. (See Schedule A for the Black Start Agreement.)</p>	<p>Amendments have been drafted for all agreements. All amendments have been sent to the other party.</p>	
55.	<p>March 12, 1998, 82 FERC ¶ 61,252 at 62,011-012</p>	<p>ISO directed to revise MSAs for ME to conform to the December 17th Order and file within 60 days of operations date. (See Schedule A for list of MSAs for ME.)</p>	<p>Amendments have been drafted for all agreements. Most amendments have been sent to the other party.</p>	
56.	<p>March 27, 1998, 82 FERC ¶ 61,312 (Amend 1, 2 & 3)</p> <p>82 FERC at 62,240-62,243</p>	<p>Amendment 1 to ISO tariff to be modified to avoid charging the exports to neighboring Control Areas for Voltage Support and Black Start and be promptly posted on the ISO Home Page. The ISO is to file the changes with its compliance filing to be filed within 60 days of the ISO Operations Date.</p> <p>[Amendments 2 and 3 rejected.]</p>	<p>Following provisions modified: Sections 2.5.28.5, 2.5.28.6 and SABP Appendix G sections 3.8 and 3.16.</p>	<p>April posting at pp. 120-122 and Appendix L pp. 729-730.</p>

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ISO 60-Day Compliance Matrix

#	FERC ORDER	FERC INSTRUCTION	Response/Tariff Section Modified	Filing/ Posting
57.	<p>March 30, 1998, 82 FERC ¶ 61,325 at 62,275</p> <p>82 FERC at 62,777-78</p>	<p>MSAs for ME accepted and made subject to outcome of proceedings in Docket Nos. ER98-1499-000. ISO is directed to revise these MSAs for ME to conform to the December 17th Order and file within 60 days of operations date. (See Schedule A for list of MSAs for ME).</p> <p>MSAs for SC accepted and made subject to outcome of proceedings in Docket Nos. ER98-1499-000. ISO is directed to revise these MSAs for SC to conform to the December 17th Order and file within 60 days of operations date. (See Schedule A for list of MSAs for SC.)</p> <p>ISO directed to revise the TCA, including to conform it to the October 30 Order, post the revised TCA and file it within 60 days of operations date.</p>	<p>Amendments have been drafted for all agreements. Most amendments have been sent to the other party.</p> <p>Amendments have been drafted for all agreements. Most amendments have been sent to the other party.</p> <p>TCA has been revised, except for issue addressed in Item 47, above.</p>	<p>Revised TCA included with compliance filing.</p>

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#	FERC ORDER	FERC INSTRUCTION	Response/Tariff Section Modified	Filing/ Posting
58.	<p>March 30, 1998, 82 FERC ¶ 61,326</p> <p>82 FERC at 62,286</p> <p>82 FERC at 62,286</p> <p>82 FERC at 62,286</p> <p>82 FERC at 62,286-287</p>	<p>This order addresses numerous PGAs, a UDC Agreement, SC Agreements and amendments to Must-Run agreements.</p> <p>The ISO directed to modify the pro forma SC Agreement [which is appended to the ISO Tariff] to comply with the 12/17 ordered modifications and then post the modified SC Agreement on ISO Home Page. Thereafter, ISO directed to file changes within 60 days of the ISO Operations Date.</p> <p>PGAs accepted and consolidated with proceedings in Docket Nos. ER98-992-000. ISO directed to revise these PGAs to conform to the December 17th Order and file within 60 days of operations date. (See Schedule A for list of PGAs.)</p> <p>ISO directed to revise SCAs to conform to the December 17th Order and file within 60 days of operations date. (See Schedule A for list of SCAs.)</p> <p>UDC Agreements accepted and consolidated with proceedings in Docket Nos. ER98-899-000. ISO directed to revise these UDC Agreements to conform to the December 17th Order and file within 60 days of operations date. (See Schedule A for list of UDC Agreements.)</p>	<p>Amendments have been drafted for all agreements. Most have been sent to the other party.</p>	<p>Modified Pro Forma Agreements currently posted on ISO Home Page.</p>
59.	<p>March 30, 1998, 82 FERC ¶ 61,327 (March 30 Order)</p>	<p>(Amendment 6) Interim liability amendment rejected (at 62,293-294). (New Section 25 rejected.)</p>	<p>Section 25 deleted.</p>	<p>April posting at p. 294.</p>

Attachment A

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#	FERC ORDER	FERC INSTRUCTION	Response/Tariff Section Modified	Filing/ Posting
60.	March 30 Order, 82 FERC at 62,294	Amendments 4, 5 & 6 to ISO Tariff (with ordered modifications to Amendment 6) shall be promptly posted on the ISO Home Page and the ISO shall make its compliance filing no later than 60 days after ISO operations commence. Compliance filing shall reflect the ordered modifications to the ISO Tariff and Protocols.	Posting and compliance modifications completed.	Amendments 4, 5 and 6 reflected in April posting.
61.	March 30 Order, 82 FERC at 62,296	ISO directed to make compliance filing of Tariff and Protocols no later than 60 days after ISO operations commence.	Compliance filing completed.	
62.	April 30, 1998, 83 FERC ¶ 61,118	MSAs for ME accepted and consolidated with proceedings in Docket Nos. ER98-1499-000. ISO directed to revise these MSAs for ME to conform to the December 17 th Order and file within 60 days of operations date. (See Schedule A for list of MSAs for ME).	Amendments have been drafted for all agreements. Most amendments have been sent to the other party.	
63.	May 28, 1998, Docket Nos. EC 96-19-023 and ER 96-1663-024	ISO directed to post Amendment 7 as modified and file changes with compliance filing due 60 days after operations commence.	Posting and compliance modification completed.	Compliance filing.