

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

City of Tacoma, Department of	)	
Public Utilities, Light Division	)	Docket No. EL24-40-000
d/b/a Tacoma Power	)	
v.	)	
	)	
California Independent System	)	
Operator Corporation	)	

**ANSWER OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
CORPORATION TO COMPLAINT**

The California Independent System Operator Corporation (CAISO) submits its answer to the complaint filed in the above-captioned proceeding by the City of Tacoma, Department of Public Utilities, Light Division d/b/a Tacoma Power (Tacoma) on December 11, 2023.<sup>1</sup>

**I. Answer**

Tacoma’s December 11 complaint appeals a tariff-required sanction of \$30,000 related to late corrections of meter data values for each trading day in September 2022. This complaint is substantially similar to three prior complaints Tacoma has filed in docket numbers EL24-25-000, EL24-14-000, and EL23-103-000. Aside from the impacted trading days, the underlying issues in these three dockets are essentially the same as the issues in this docket. The CAISO’s answer in those three dockets explained it supports relief for parties such as Tacoma that have established they are subject to inequitable penalties under the

---

<sup>1</sup> The CAISO files this answer pursuant to Rule 213 of the Federal Energy Regulatory Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.213.

existing tariff rules. For these reasons, the CAISO supports the relief Tacoma seeks in in this docket.

**II. Communications**

Under Rule 203(b)(3) of the Commission’s Rules of Practice and Procedure, the CAISO respectfully requests that service of all pleadings, documents, and all communications regarding this proceeding be addressed to:

David S. Zlotlow  
Lead Counsel  
California Independent System  
Operator Corporation  
250 Outcropping Way  
Folsom, CA 95630  
Tel: (916) 351-4400  
Fax: (916) 608-7222  
Email: [dzlotlow@caiso.com](mailto:dzlotlow@caiso.com)

**III. Conclusion**

The CAISO supports Tacoma’s request to excuse the meter data sanction at issue in the above-captioned complaint.

**/s/ David S. Zlotlow**

Roger E. Collanton  
General Counsel  
Anthony Ivancovich  
Deputy General Counsel  
Andrew Ulmer  
Assistant General Counsel  
David S. Zlotlow  
Lead Counsel  
California Independent System  
Operator Corporation  
250 Outcropping Way  
Folsom, CA 95630

Counsel for the California Independent  
System Operator

Dated: December 18, 2023

## **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 18<sup>th</sup> day of December, 2023.

*/s/ Ariana Rebancos*

Ariana Rebancos

An employee of the California ISO