

December 19, 2013

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

**Re: California Independent System Operator Corporation
Filing to Comply with Order No. 676-G
Docket No. ER14- ____ -000**

Dear Secretary Bose:

The California Independent System Operator Corporation (“ISO”)¹ submits this filing in compliance with the Commission’s Order No. 676-G.² In Order No. 676-G, the Commission directed public utilities to incorporate by reference in their jurisdictional tariffs certain business practice standards promulgated by the Wholesale Electric Quadrant (“WEQ”) of the North American Energy Standards Board (“NAESB”) and included by reference in the Commission’s regulations. None of the NAESB standards adopted by Order No. 676-G require substantive ISO tariff revisions for implementation. The ISO accordingly requests Commission acceptance of proposed modifications to the ISO tariff to incorporate the NAESB standards into the tariff by reference, effective 61 days after the date of this filing, *i.e.*, February 18, 2014.

I. Background

Order No. 676-G directed Independent System Operators (“ISOs”) and Regional Transmission Organizations (“RTOs”) to revise their Open Access Transmission Tariffs (“OATTs”) to include the following NAESB business practice standards: (1) the NAESB Phase II Demand Response Measurement and

¹ Capitalized terms not otherwise defined herein have the meanings set forth in appendix A to the ISO tariff.

² *Standards for Business Practices and Communication Protocols for Public Utilities*, Order No. 676-G, FERC Stats. & Regs. ¶ 31,343 (2013) (“Order No. 676-G”). The ISO submits this filing pursuant to section 205 of the Federal Power Act, 16 U.S.C. § 824d.

Verification (“M&V”) Standards collectively identified by NAESB as 2010 WEQ Annual Plan Items 4(a) and 4(b); and (2) the NAESB Energy Efficiency M&V Standards collectively identified by NAESB as 2010 WEQ Annual Plan Item 4(d).³ The Commission also incorporated those NAESB standards into its regulations by reference.⁴

The Commission stated that if adoption of the NAESB standards did not require any changes or revisions to an ISO’s or RTO’s existing OATT provisions, such ISOs and RTOs could comply with Order No. 676-G by adding provisions to their OATTs that incorporated the NAESB standards by reference.⁵ The Commission directed that such ISOs and RTOs incorporate these NAESB standards by adding the following referencing language to their OATTs:

Measurement and Verification of Wholesale Electricity Demand Response (WEQ-015, 2010 Annual Plan Items 4(a) and 4(b), March 21, 2011), and Measurement and Verification of Wholesale Electricity Efficiency (WEQ-021 2010 Annual Plan Item 4(d), July 16, 2012).⁶

The Commission explained that compliance with Order No. 676-G would be required as of the date the Order became effective, *i.e.*, May 6, 2013.⁷ However, any OATT revisions required to comply with Order No. 676-G needed to be filed by December 31, 2013.⁸

II. Proposed Tariff Revisions

In accordance with Order No. 676-G, the ISO has modified section 7.3.3 of its tariff to incorporate those NAESB standards by reference, using the referencing language prescribed in Order 676-G quoted above.

III. Effective Date

³ Order No. 676-G at P 8 n.16 and P 54.

⁴ *Id.* at PP 33, 47 (describing incorporation of the NAESB standards by reference into 18 C.F.R. § 38.2).

⁵ *Id.* at PP 54, 56.

⁶ *Id.* at P 56.

⁷ *Id.* at P 54. May 6, 2013 was the date 60 days after Order No. 676-G was published in the Federal Register.

⁸ *Id.* at P 55.

The ISO requests that the tariff revisions contained in this filing be made effective 61 days after the date of the filing, *i.e.*, February 18, 2014.

IV. Communications

Correspondence and other communications regarding this filing should be directed to:

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V. Service

The ISO has served copies of this filing on the California Public Utilities Commission, the California Energy Commission, and all parties with scheduling coordinator agreements under the ISO tariff. In addition, the ISO has posted a copy of the filing on the ISO website.

VI. Contents of this Filing

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

Attachment A	Clean ISO tariff sheet incorporating the compliance changes described above
Attachment B	Red-lined document showing the revisions contained in this compliance filing

VII. Conclusion

For the reasons set forth in this filing, the ISO respectfully requests that the Commission accept the tariff revisions proposed in the filing as complying with Order No. 676-G, effective as of February 18, 2014.

Respectfully submitted,

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Counsel for the California Independent System Operator Corporation

Attachment A – Clean

Order 676-G Compliance

California Independent System Operator Corporation

December 19, 2013

7.3.3 NAESB Standards

The following standards of the Wholesale Electric Quadrant (WEQ) of the North American Energy Standards Board (NAESB) are incorporated by reference:

- Business Practices for Open Access Same-Time Information Systems (OASIS), Version 1.5 (WEQ-001, Version 002.1, March 11, 2009, with minor corrections applied May 29, 2009 and September 8, 2009) with the exception of Standards 001-0.1, 001-0.9 through 001-0.13, 001-1.0, 001-9.7, 001-14.1.3, 001-15.1.2 and exclusively as to Standards 001-13.1.1, 001-13.1.4, 001-13.1.5, and 001-16.
- Coordinate Interchange (WEQ-004, Version 002.1, March 11, 2009, with minor corrections applied May 29, 2009 and September 8, 2009);
- Area Control Error (ACE) Equation Special Cases (WEQ-005, Version 002.1, March 11, 2009, with minor corrections applied May 29, 2009 and September 8, 2009);
- Manual Time Error Correction (WEQ-006, Version 001, October 31, 2007, with minor corrections applied on Nov. 16, 2007);
- Inadvertent Interchange Payback (WEQ-007, Version 002.1, March 11, 2009, with minor corrections applied May 29, 2009 and September 8, 2009);
- Gas/Electric Coordination (WEQ-011, Version 002.1, March 11, 2009, with minor corrections applied May 29, 2009 and September 8, 2009);
- Public Key Infrastructure (PKI) (WEQ-012, Version 002.1, March 11, 2009, with minor corrections applied May 29, 2009 and September 8, 2009);
- Measurement and Verification of Wholesale Electricity Demand Response (WEQ-015, 2010 Annual Plan Items 4(a) and 4(b), March 21, 2011); and
- Measurement and Verification of Wholesale Electricity Efficiency (WEQ-021, 2010 Annual Plan Item 4(d), July 16, 2012).

The CAISO has applied for a waiver of the following NAESB WEQ standards:

- Business Practices for Open Access Same-Time Information Systems (OASIS), Version 1.5 (WEQ-001, Version 002.1, March 11, 2009, with minor corrections applied May 29, 2009 and September 8, 2009) with the exception of Standards 001-0.1, 001-0.9 through 001-0.13, 001-1.0, 001-9.7, 001-14.1.3, 001-15.1.2 and except as set forth above;
- Business Practices for Open Access Same-Time Information Systems (OASIS) Standards & Communication Protocols, Version 1.5 (WEQ-002, Version 002.1, March 11, 2009, with minor corrections applied May 29, 2009 and September 8, 2009);
- Open Access Same-Time Information Systems (OASIS) Data Dictionary, Version 1.5 (WEQ-003, Version 002.1, March 11, 2009, with minor corrections applied May 29, 2009 and September 8, 2009);
- Transmission Loading Relief – Eastern Interconnection (WEQ-008, Version 002.1, March 11, 2009, with minor corrections applied May 29, 2009 and September 8, 2009); and
- Business Practices for Open Access Same-Time Information Systems (OASIS) Implementation Guide, Version 1.5 (WEQ-013, Version 002.1, March 11, 2009, with minor corrections applied May 29, 2009 and September 8, 2009).

Attachment B – Marked

Order 676-G Compliance

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- Coordinate Interchange (WEQ-004, Version 002.1, March 11, 2009, with minor corrections applied May 29, 2009 and September 8, 2009);
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- Public Key Infrastructure (PKI) (WEQ-012, Version 002.1, March 11, 2009, with minor corrections applied May 29, 2009 and September 8, 2009); ~~and~~
- Measurement and Verification of Wholesale Electricity Demand Response (WEQ-015, 20~~1008~~ Annual Plan Items ~~54~~(a) ~~and~~ 4(b), March ~~2146~~, 20~~1199~~); ~~and~~
- Measurement and Verification of Wholesale Electricity Efficiency (WEQ-021, 2010 Annual Plan Item 4(d), July 16, 2012).

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