



June 17, 2024

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

**Re: California Independent System Operator Corporation  
Docket No. ER22-906-\_\_\_\_\_  
Quarterly Informational Report Regarding Transmission  
Service and Market Scheduling Priorities Stakeholder Process**

Dear Secretary Bose:

The California Independent System Operator Corporation (CAISO) hereby submits its final quarterly report regarding the CAISO's Transmission Service and Market Scheduling Priorities stakeholder initiative.

Please contact the undersigned with any questions.

Respectfully submitted,

**By: /s/ Andrew Ulmer**

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# California ISO

**Final Quarterly Informational Report  
(Docket No. ER22-906)  
Status of Transmission Service and Market Scheduling  
Priorities Stakeholder Process**

**June 17, 2024**

On March 15, 2022, the Federal Energy Regulatory Commission (Commission) issued an order<sup>1</sup> extending until June 1, 2024 the California Independent System Operator Corporation's (CAISO) tariff provisions regarding the scheduling priorities for wheeling through transactions. The Commission initially approved such tariff provisions on an interim basis -- until June 1, 2022 -- in an order issued on June 25, 2021 in Docket No. ER21-1790.<sup>2</sup> In its March 15, 2022 Order, the Commission also directed the CAISO to file quarterly informational reports to update the Commission on the CAISO's efforts toward developing successor rules delineating rights for wheeling through transactions across the CAISO grid. The Commission stated that the CAISO must file the reports beginning three months after the March 15 Order and every three months thereafter until the CAISO files a long-term solution with the Commission. The Commission also stated that such reports should describe any long-term alternative solutions under consideration in the stakeholder process, explain any potential impediments to implementing any particular solution, and provide an updated schedule for finalizing a proposal. This is the CAISO's ninth and final report to the Commission.

### **Transmission Service and Market Scheduling Priorities Stakeholder Process**

On July 28, 2023, the CAISO filed tariff revisions arising from Phase 2, Track 1 of its Transmission Service and Market Scheduling Priorities stakeholder process (July 28 Filing). The tariff revisions would (1) implement a durable framework for external load serving entities and suppliers serving them to obtain in advance, on a monthly and daily basis, Wheeling Through self-schedule priorities equal to the scheduling priority of CAISO demand, and (2) update the CAISO's calculation of Available Transfer Capability (ATC). The proposed tariff revisions would replace the interim Wheeling Through tariff provisions that expire June 1, 2024. On October 30, 2023, the Commission issued an order accepting the CAISO's tariff revisions in the July 28 Filing to implement a framework for external entities to obtain, in advance, on a monthly and daily basis, wheeling through scheduling priorities equal to the scheduling priority of CAISO demand (wheeling through priority), as well as related updates to CAISO's calculation of Available Transfer Capability (ATC).<sup>3</sup> Subsequently, on November 29, 2023, the CAISO submitted a compliance filing as directed by the Commission's October 30, 2023 Order.

The CAISO has implemented tariff revisions to publish monthly and daily available transfer capacity (ATC) values and open request windows to enable the reservation of ATC and establishment of Wheeling Through self-schedule priorities for June 2024 and beyond. On April 12, 2024, the CAISO filed a petition for a limited waiver to extend the effective date of tariff provisions to allow for resale or assignment of monthly Wheeling Through self-

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<sup>1</sup> *Cal. Indep. Sys. Operator Corp.*, 178 FERC ¶ 61,181 (2022) (March 15 Order).

<sup>2</sup> *Cal. Indep. Sys. Operator Corp.*, 175 FERC ¶ 61, 245 (2021). This order approved a tariff amendment filed by the CAISO on April 28, 2021 (April 28 Tariff Amendment).

<sup>3</sup> *Cal. Indep. Sys. Operator Corp.*, 185 FERC ¶ 61,085 (2023) (October 30, 2023 Order)

schedule priority. The CAISO is working to implement these provisions later this year. That petition remains pending before the commission in docket ER23-2510.

In Track 2 of Phase 2 of the Transmission Service and Market Scheduling Priorities stakeholder process, the CAISO proposed to develop a new process whereby entities seeking to establish Wheeling Through scheduling priority in annual increments, for one year or longer, commencing beyond the 13-month rolling horizon in which the CAISO proposes to calculate ATC. The CAISO conducted a stakeholder process to develop tariff language to effect these changes. Under its draft tariff revisions, the CAISO would study such requests in a cluster with other like requests and generator interconnection requests, leveraging the deliverability processes under the Generator Interconnection and Deliverability Allocation Procedures (GIDAP). If a transmission upgrade is needed to accommodate service, the entity submitting the request would be able to fund the transmission upgrade and receive a wheeling through scheduling priority equal to load on a long-term basis. In light of pending changes to the CAISO's GIDAP under consideration in connection with the CAISO's compliance with Commission Order No. 2023, the CAISO does not have a target filing date for these tariff revisions. Once the CAISO has implemented the provisions of Order No. 2023, the CAISO intends to revisit whether there is sufficient interest to support filing tariff revisions to establish Wheeling Through scheduling priority, in annual increments, for one year or longer through a study and transmission expansion process.

## **CERTIFICATE OF SERVICE**

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the above-referenced proceeding, 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 17th day of June, 2024.

*/s/ Jacqueline Meredith*  
Jacqueline Meredith