



California Independent
System Operator Corporation

June 24, 2025

The Honorable Debbie-Anne A. Reese
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-K in RM05-5-31 and Request for
Waiver
Docket No. ER25-____-000**

Dear Secretary Reese:

The California Independent System Operator Corporation (CAISO)¹ submits this compliance filing to incorporate by reference the latest version (Version 004) of the Standards for Business Practices and Communication Protocols of the Wholesale Electric Quadrant (WEQ) adopted by the North American Energy Standards Board (NAESB) and as incorporated by reference into the Commission's regulations in Order No. 676-K.² The CAISO requests that the Commission accept the enclosed tariff revisions to incorporate these NAESB standards into its tariff by reference, with an

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

² *Standards for Bus. Practices & Commc'n Protocols for Pub. Utils.*, Order No. 676-K, 190 FERC ¶ 61,116 (2025) ("Order No. 676-K").

effective date of February 27, 2026 as to the NAESB cybersecurity standards and August 27, 2026 as to the remaining NAESB Version 004 standards.

The CAISO also requests a waiver of specified business practice standards. As the CAISO has indicated in several previous NAESB waiver filings and in other filings with the Commission, the CAISO's ancillary service and imbalance energy markets and transmission reservation services differ significantly from the business model and the transmission services contemplated in the pro forma Open Access Transmission Tariff (OATT). The Commission has acknowledged these differences and granted the CAISO a series of waivers from specific NAESB business standards. The instant request seeks to extend these waivers to both updated and new NAESB WEQ standards adopted by Order No. 676-K and incorporated into the Commission's regulations, 18 C.F.R. Part 38, that continue to be, or are, inapplicable to, and incompatible with, the CAISO's markets and transmission services.

I. Background

In Order No. 676-K, the Commission amended its regulations to incorporate by reference the latest version (Version 004) of specified business practice standards that NAESB filed with the Commission on July 31, 2023.³ The Version 004 NAESB standards include newly created standards, as well as modifications to existing standards, developed through the NAESB standards development process.

The Version 004 standards include standards developed in response to the directives from Order Nos. 676-I and 676-J, business practice standards developed to

³ Order No. 676-K at P 6.

support cybersecurity for the wholesale electric industry, modifications to complement the NERC Reliability Standards, the new NAESB Base Contract for Sale and Purchase of Voluntary Renewable Energy Certificates, and standards to identify definitions for common grid services to support distributed energy resource interactions in response to a request submitted by the DOE, Lawrence Berkeley National Laboratory, and Pacific Northwest National Laboratory.⁴ Additionally, the WEQ Version 004 Standards include modifications applied to Open Access Same-Time Information Systems (OASIS) Business Practice Standards, the Coordinate Interchange Business Practice Standards, and the Abbreviations, Acronyms, and Defined Terms.⁵

Order No. 676-K directed public utilities to revise their OATTs to incorporate the following NAESB standards by reference:

- WEQ-000, Abbreviations, Acronyms, and Definition of Terms (WEQ Version 004, July 31, 2023);
- WEQ-001, Open Access Same-Time Information Systems (OASIS) (WEQ Version 004, July 31, 2023), with Minor Correction MC24004 applied to standard WEQ-001-24.2.4 (August 9, 2024);

⁴ *Id.*

⁵ *Id.*

- WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocol (S&CP) (WEQ Version 004, July 31, 2023);
- WEQ-003, Open Access Same-Time Information Systems (OASIS) Data Dictionary (WEQ Version 004, July 31, 2023);
- WEQ-004, Coordinate Interchange (WEQ Version 004, July 31, 2023);
- WEQ-005, Area Control Error (ACE) Equation Special Cases (WEQ Version 004, July 31, 2023);
- WEQ-006, Manual Time Error Correction (WEQ Version 004, July 31, 2023);
- WEQ-007 Inadvertent Interchange Payback (WEQ Version 004, July 31, 2023);
- WEQ-008, Transmission Loading Relief (TLR) – Eastern Interconnection (WEQ Version 004, July 31, 2023);
- WEQ-011, Gas/Electric Coordination (WEQ Version 004, July 31, 2023);
- WEQ-012, Public Key Infrastructure (PKI) (WEQ Version 004, July 31, 2023);
- WEQ-013, Open Access Same-Time Information Systems (OASIS) Implementation Guide (WEQ Version 004, July 31, 2023);
- WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response (WEQ Version 004, July 31, 2023);

- WEQ-021, Measurement and Verification of Energy Efficiency Products (WEQ Version 004, July 31, 2023);
- WEQ-022, Electric Industry Registry (EIR) (WEQ Version 004, July 31, 2023);
- WEQ-023, Modeling (WEQ Version 004, July 31, 2023); and
- WEQ-024, Cybersecurity (WEQ Version 004, July 31, 2023).⁶

The Commission directed public utilities to submit a single compliance filing by June 27, 2025 that includes two separate tariff records in eTariff: (1) the first record must include a reference to the WEQ Version 004 NAESB cybersecurity standards with a proposed effective date of February 27, 2026; and (2) the second record must refer to all the WEQ Version 004 standards adopted in Order No. 676-K with an effective date of August 27, 2026.⁷ The public utility must also include in its compliance filing any new waiver requests to comply with a part of Order No. 676-K or requests to preserve any existing waivers.⁸

II. Proposed Tariff Revisions

Adoption of the Version 004 NAESB standards set forth in Order No. 676-K does not require any substantive changes or revisions to the existing provisions of the CAISO tariff. Therefore, in accordance with Order No. 676-K, the CAISO has revised section

⁶ Order No. 676-K at P 12.

⁷ Order No. 676-K at P 45.

⁸ Order No. 676-K at P 47.

7.3.3 of its tariff to incorporate those NAESB standards by reference, using the referencing language prescribed in Order 676-K and replicated in Section I above.

The CAISO has also revised tariff section 7.3.3 to list the Version 004 NAESB standards for which the CAISO has requested waiver, pursuant to Section III below.

III. Waiver Requests

The CAISO respectfully requests that the Commission grant the waivers requested herein regarding certain remaining standards adopted in Order No. 676-K and consistent with the waivers of NAESB standards that the Commission previously granted to the CAISO. The CAISO also seeks to preserve its existing waivers to both updated and new NAESB standards adopted in Order No. 676-K that continue to be, or are, inapplicable to and incompatible with the CAISO's markets and transmission services.

A. Prior CAISO Waivers

As the CAISO explained in its petitions for waiver of NAESB standards implemented in Order Nos. 676, 676-C, 676-E, 676-H, 676-I, and 676-J, the CAISO's ancillary service and imbalance energy markets and financial transmission model differ significantly from the business model and the physical transmission services articulated in Order No. 888 and later in the Order No. 890 *pro forma* OATT, upon which many of the NAESB standards are based. These differences have meant the Commission found it appropriate to grant the following waivers to the CAISO:

- The Commission granted the CAISO an interim waiver of OASIS requirements when it authorized the CAISO's operation as an independent system operator. The Commission cited as relevant factors in this determination the lack of reserved firm and non-firm point-to-point transmission service under the CAISO

tariff and the incompatibility of the CAISO computer communication system with the OASIS standards and protocols incorporated into the Commission's regulations.⁹

- The Commission extended the interim waiver of the OASIS requirements upon approval of the CAISO's firm transmission rights proposal.¹⁰
- The Commission accepted the CAISO's request for a comprehensive waiver of OASIS-related standards WEQ-001, WEQ-002, and WEQ-003 adopted in Order No. 676. This waiver was limited to the period prior to implementation of the CAISO's new market design based on locational marginal pricing.¹¹
- The Commission accepted the CAISO's filing to comply with Order No. 890, including waivers of the OASIS posting requirements and associated NAESB business practice standards pertaining to denials of service, the designation of network resources, and the posting of system impact studies, facilities studies, and studies performed for the transmission provider's own network resources.¹²
- The Commission granted the CAISO's requests for waiver of the revised OASIS requirements and associated NAESB standards adopted in Order No. 676-C, including waiver of WEQ-001, WEQ-002, WEQ-003, WEQ-008 and WEQ-013, and limited waiver of WEQ-012.¹³
- The Commission granted the CAISO's request for waiver of OASIS-related standards and communication protocols set forth in the Commission's regulations that would be inapplicable to and incompatible with operations under the CAISO's market design based on locational marginal pricing that would be implemented on April 1, 2009.¹⁴
- The Commission granted the CAISO's requests for waiver of certain new and revised standards adopted in Order No. 676-E, including waiver of specified

⁹ *Pac. Gas & Elec. Co.*, 81 FERC ¶ 61,122, at 61,459-60 (1997). Although the Commission granted interim waiver, it also found that the CAISO's communication system "meets the needs of . . . Market Participants, including the [CAISO's] transmission customers." *Id.* at 61,460.

¹⁰ *Cal. Indep. Sys. Operator Corp.*, 89 FERC ¶ 61,153, at 61,437-38 (1999).

¹¹ *Cal. Indep. Sys. Operator Corp.*, 117 FERC ¶ 61,196 (2006).

¹² *Cal. Indep. Sys. Operator Corp.*, 123 FERC ¶ 61,180 (2008).

¹³ *Cal. Indep. Sys. Operator Corp.*, 125 FERC ¶ 61,380 (2008).

¹⁴ *Cal. Indep. Sys. Operator Corp.*, 126 FERC ¶ 61,260 (2009).

standards under WEQ-001, WEQ-002, WEQ-003, WEQ-008, and WEQ-013.¹⁵

- The Commission granted the CAISO's requests for waiver of certain new and revised standards adopted in Order No. 676-H, including waiver of specified standards under WEQ-001, WEQ-002, WEQ-003, WEQ-012, and WEQ-013.¹⁶
- The Commission granted the CAISO's requests for waiver of certain new and revised standards adopted in Order No. 676-I, including waiver of specified standards under WEQ-001, WEQ-002, WEQ-003, WEQ-012, WEQ-013, and WEQ-023, and a limited waiver of WEQ-006 to the extent certain requirements related to manual time error correction are inconsistent with the Western Interconnection's use of automatic time error correction.¹⁷
- The Commission granted the CAISO's request for waiver of the cybersecurity standards set forth in WEQ-001 (except for the WEQ-001-9 preamble text, WEQ-001-10 preamble text, WEQ-001-13.1.1, WEQ-001-13.1.4, WEQ-001-13.1.5, and WEQ-001-16) and WEQ-002, Version 003.3.¹⁸
- The Commission granted the CAISO's requests for waiver of certain new and revised standards adopted in Order No. 676-J, including waiver of specified standards under WEQ-001 (except for WEQ-001-28-1.3 and WEQ-001-28-1.3.1), WEQ-002, WEQ-003, WEQ-012, and WEQ-013.¹⁹

B. The Commission Should Grant Waiver of Those NAESB Business Practice Standards that Are Inapplicable to and Incompatible with the CAISO's Business Model

1. Request For Renewed Waivers

In Order No. 676, the Commission stated that public utilities with existing waivers of certain NAESB standards may reapply for such waivers using simplified procedures.

¹⁵ Commission Letter Order, Docket No. ER11-3099-000 (Feb. 15, 2013); Commission Letter Order, Docket Nos. ER11-3096-000 and ER11-3096-001 (Mar. 13, 2013).

¹⁶ *Cal. Indep. Sys. Operator Corp.*, 151 FERC ¶ 61,151 (2015).

¹⁷ *Cal. Indep. Sys. Operator Corp.*, 178 FERC ¶ 61,158 (2022).

¹⁸ *Cal. Indep. Sys. Operator Corp.*, 182 FERC ¶ 61,123 (2023).

¹⁹ *Cal. Indep. Sys. Operator Corp.*, 185 FERC ¶ 61,072 (2023).

These procedures require an applicant to identify the specific standards from which it seeks waiver and provide the caption, date, and docket number of the proceeding in which the entity received the waiver. In addition, the applicant must certify that the circumstances warranting the waivers have not changed.²⁰

The CAISO respectfully requests renewed waivers of the Version 004 NAESB standards consistent with prior waivers the Commission granted the CAISO for earlier versions of these NAESB standards. Specifically, the CAISO requests comprehensive renewed waivers of WEQ-002, WEQ-003, and WEQ-013, and waiver of the provisions of WEQ-001, WEQ-012 and WEQ-023, consistent with prior waivers of these standards that the Commission has granted.²¹ While some of the earlier versions of the NAESB standards have been modified in Version 004, the revised standards remain strictly focused on transmission providers that offer physical reservation transmission service. As discussed below and in its prior waiver requests, the CAISO does not offer physical reservation transmission service.

For these reasons, the CAISO hereby certifies that the circumstances warranting Commission waiver of the NAESB standards discussed above have not changed. The Version 004 standards for which the CAISO seeks waiver continue to be inapplicable to, and incompatible with, the CAISO's markets and transmission service, and CAISO

²⁰ *Standards for Bus. Practices & Comm'n Protocols for Pub. Utils*, Order No. 676, FERC Stats. & Regs. ¶ 31,216, at P 79 (2006).

²¹ See 125 FERC ¶ 61,380; 126 FERC ¶ 61,260. In the latter order, the Commission found that "the standards at issue are incompatible with the transmission services provided under both the CAISO's current tariff and the [revised market design], for the reasons the CAISO states. We also find that the CAISO's proposed alternative OASIS postings are consistent with our OASIS standards and business practices." *Id.* at P 29.

compliance with those NAESB standards would not serve to enhance information available to CAISO market participants.

2. Request for Waiver of Newly Adopted Standards

The newly adopted OASIS requirements within the NAESB standards are based on the transmission service model embodied in the *pro forma* OATT.²² That service model contemplates that electric utilities provide two types of transmission service: (1) point-to-point transmission service (which can be either firm or non-firm) and (2) network integration transmission service. Under the *pro forma* OATT service model, customers submit formal transmission service requests to the transmission provider in order to reserve capacity. Users may also, on a first-come, first-served basis, reserve available transmission capacity for the long term. The *pro forma* OATT service model also accommodates resale transactions (*i.e.*, reassignments) and transfers of transmission reservation rights, as well as firm and non-firm redirects.

The CAISO does not offer the two distinct transmission services (*i.e.*, point-to-point service and network integration transmission service) contemplated in the *pro forma* OATT. Rather, the CAISO provides a form of service available to all eligible customers on a nondiscriminatory basis.²³ Energy transmitted under the CAISO tariff is

²² In the filing the CAISO submitted to comply with Order No. 890, it demonstrated that its “daily” transmission service model differs substantially from the transmission service model in the *pro forma* OATT and that the transmission service-related changes (*e.g.*, changes related to network integration and point-to-point transmission services, capacity reassignments, and rollover rights) adopted in Order No. 890 did not apply to, and/or were incompatible with, the CAISO’s service model. The CAISO also demonstrated that its transmission service model was consistent with or superior to the *pro forma* OATT service model as revised in Order No. 890. The Commission accepted the CAISO’s compliance demonstration on these matters. 123 FERC ¶ 61,180, at P 18.

²³ The open access transmission service provided by the CAISO is essentially a network-type service, but with more flexibility than the network integration transmission service provided under the *pro*

treated as “new firm use” and scheduled on a day-to-day basis by transmission customers (with the exception of certain transactions scheduled pursuant to grandfathered contracts that preceded the existence of the CAISO). All users of the CAISO controlled grid must schedule their use each day and cannot reserve available transmission capacity beyond the day-ahead timeframe.²⁴ There are no long-term reservations of physical transmission capacity under the CAISO’s service model, and there is no application process for transmission service requests, use of capacity benefit margins, or performance of transmission service request studies.²⁵

Under the CAISO's existing market service model, scheduling coordinators submit bids (including self-schedules) for the supply or demand for energy to the CAISO. Scheduling coordinators have equal access to all available capacity every day and can make changes to their bids on an hourly basis. In contrast to transmission services provided under the *pro forma* OATT, customers that take service under the

forma OATT.

²⁴ Under the CAISO’s Commission-approved service model, there are no long-term reservations of transmission capacity or rollover rights. As the Commission recognized, the CAISO’s “proposal to schedule transmission on a day-ahead and hour-ahead basis is not compatible with the long-term reservation of discrete physical transmission rights.” 81 FERC ¶ 61,122, at 61,472. Accordingly, the Commission has ordered customers with grandfathered contracts to take service under the CAISO tariff upon expiration of such contracts. *Id.* at 61,463-65. The Commission found that the right-of-first-refusal provision under Order No. 888 does not apply to customers in the CAISO service territory because the service model under the Order No. 888 *pro forma* OATT does not apply to the CAISO. *Sacramento Mun. Util. Dist. v. Pac. Gas & Elec. Co.*, 105 FERC ¶ 61,237 (2004), *aff’d sub nom. Sacramento Mun. Util. Dist. v. FERC*, 428 F.3d 294 (D.C. Cir. 2005).

²⁵ The CAISO tariff does have two categories of wheeling through self-schedule transactions: (1) a priority wheeling through, which receives the same priority as CAISO load, and (2) a non-priority wheeling through, which will have a lower priority than priority wheeling through transactions and CAISO load. *Cal. Indep. Sys. Operator Corp.*, 175 FERC ¶ 61,245 (2021). Although priority wheeling through status requires notification to the CAISO 45 days in advance of the applicable month, it does not constitute a long-term reservation of physical transmission capacity.

CAISO's market need not formally designate network resources. The CAISO utilizes a bid-based, security constrained economic dispatch and re-dispatch process to balance real-time control area requirements, utilize the full capability of the grid to maximize the transmission service that can be provided to eligible customers, provide customers with maximum flexibility to schedule transactions, and ration capacity when demand for transfer capability exceeds supply. Thus, the CAISO's transmission service provides comparable treatment to all customers and encourages efficient and flexible use of the transmission system.

The CAISO does not offer conditional firm transmission service. Order No. 890 did not require it to do so.²⁶ Further, in contrast to traditional transmission services provided under the *pro forma* OATT, CAISO customers that take service need not formally designate and un-designate network resources.

In short, the CAISO's transmission service model does not have any of the following features typically associated with *pro forma* OATT transmission service: separate network integration and point-to-point transmission services; non-firm transmission services; formal transmission service requests (and applications); transmission service reservations; re-sales (or reassignments); redirects; network resources; or transfers of transmission reservation rights, capacity benefit margins, or

²⁶ In Order No. 890, the Commission stated that it would be inappropriate to require independent system operators and regional transmission organizations with real-time energy markets to provide conditional firm point-to-point service. *Preventing Undue Discrimination & Preference in Transmission Serv.*, Order No. 890, FERC Stats. & Regs. ¶ 31,241, at P 992 (2007). Because the CAISO has a real-time energy market, it is not required to provide conditional firm point-to-point service. The Commission accepted this aspect of the CAISO's compliance demonstration in approving the CAISO's filing to comply with Order No. 890. See 123 FERC ¶ 61,180, at PP 9, 18.

rollover rights.

Consistent with the foregoing discussion, the CAISO respectfully requests that the Commission grant waivers of the newly adopted OASIS requirements in the Version 004 NAESB standards, including:

(1) **WEQ-001, WEQ-003, and WEQ-013 (Standards for Redirection of Transmission Service)** – Revisions were made to WEQ-001, WEQ-003, and WEQ-013 to provide greater specificity regarding the transmission service reservation process that applies to redirection of transmission service (redirects) on a firm and non-firm basis.²⁷ As explained above, the Commission has granted the CAISO waivers involving transmission reservations as being incompatible with the CAISO's transmission service which does not use negotiations or confirmations related to physical reservations. The CAISO's market model also does not use redirect requests, and the Commission has not required the CAISO to do so. Therefore, these revisions augment processes that are inapplicable to the CAISO.

(2) **WEQ-023-1.4 (Contract Path Management)** – Modifications were made to WEQ-023-1.4 to allow requests for firm transmission service where the transactions exceed the contract path limit.²⁸ As explained above, the CAISO's transmission service model does not have formal transmission service requests.

(3) **WEQ-012 (Modifications to Support Cybersecurity for the Wholesale Electric Industry)** – Modifications were made to WEQ-012 to support the issuance of

²⁷ Order No. 676-K at P 18.

²⁸ Order No. 676-K at P 20.

server-side or transport layer security certificates by NAESB Authorized Certification Authorities (ACA).²⁹ Consistent with prior waivers³⁰ it has received from the Commission, the CAISO requests a limited waiver of these revisions to the extent they apply to OASIS applications. The CAISO's use of OASIS to disseminate only public information, and use of other systems and applications to exchange information and communications with individual market participants, means no secure communications occur through the OASIS. Accordingly, there is no need for PKI to provide the Confidentiality, Authentication, Integrity and Non-Repudiation security services contemplated in WEQ-012 in connection with the CAISO's OASIS operations. The CAISO will continue to comply with WEQ-012 in those instances where it is applicable to the CAISO's operations.

(4) WEQ OASIS Standards (Eligibility and Treatment of Rollover Rights)

– Modifications were made to the WEQ OASIS suite of Business Practice Standards to address the eligibility and treatment of rollover rights as part of the standards supporting Network Integration Transmission Service (NITS).³¹ As explained above, the CAISO's Commission approved transmission service does not provide for rollover rights, and its transmission model does not offer a distinct network integration transmission service.

(5) WEQ-002 and WEQ-003 (Submission of Variables Associated with NITS) - Modifications were made to WEQ-002 and WEQ-003 to give users the ability to

²⁹ Order No. 676-K at PP 21-22.

³⁰ See, e.g., *Cal. Indep. Sys. Operator Corp.*, 125 FERC ¶ 61,380 (2008).

³¹ Order No. 676-K at P 25.

submit specific lists of variables associated with NITS as part of the query/response functionality in OASIS templates.³² As explained above, the CAISO's transmission model does not offer a distinct network integration transmission service.

(6) WEQ-001 (Provide Consistency Between Standards Language) -

Modifications were made to WEQ-001 to provide greater consistency between the standards language included in WEQ-001-9.2 and WEQ-001-9.4.3 and WEQ-001-B Appendix B – Redirect Business Practice Standards Examples.³³ As mentioned earlier, the CAISO's market model does not use redirect requests, and the Commission has not required the CAISO to do so.

(7) WEQ-002, WEQ-003, and WEQ-013 (Improvements for OASIS Node Users) – Revisions were made to WEQ-002, WEQ-003, and WEQ-013 to establish a mechanism that enables OASIS node users to identify – in a single location – all service modifications made to an original transmission service request reservation.³⁴ As explained above, the CAISO's transmission service model does not have formal transmission service requests or reservations.

(8) WEQ-001 (Better Support Posting Requirements) – Modifications were made to WEQ-001 to better support transmission service posting requirements, included as part of 18 CFR 37.6, by adding specificity regarding the treatment of

³² Order No. 676-K at P 26.

³³ Order No. 676-K at P 27.

³⁴ Order No. 676-K at P 28.

consolidations of transmission service requests.³⁵ As explained above, the CAISO's transmission service model does not have formal transmission service requests.

(9) WEQ-001 (Provide Greater Clarity Regarding Priorities Between a Firm Transmission Service Request and a Previously Queued Non-Firm Request)

– Modifications were made to WEQ-001 by revising Table 25-3, Priorities for Competing Reservations or Requests, to better describe how a competition is conducted between a firm transmission service request and a previously queued non-firm request or reservation.³⁶ As explained above, the CAISO's transmission service model does not have formal transmission service requests or reservations.

(10) WEQ-001-4.13, WEQ-001-25.1.8, and WEQ-001-105.1.5 (Response Timing Standards) – Modifications were made to the timing tables included in WEQ-001-4.13, WEQ-001-25.1.8, and WEQ-001-105.1.5 to extend specific timing criteria for instances in which systems are not fully automated.³⁷ These changes apply to transmission providers who do not have automated systems for responding to transmission service requests. As explained above, the CAISO's transmission service model does not have formal transmission service requests.

(11) WEQ OASIS Standards (Provide Greater Clarity for Transmission Customers) – Modifications were made to the WEQ OASIS suite of Business Practice Standards to provide greater clarity for transmission customers on which redirect

³⁵ Order No. 676-K at P 29.

³⁶ Order No. 676-K at P 30.

³⁷ Order No. 676-K at P 31.

requests would qualify for the conveyance of rollover rights.³⁸ As explained above, the CAISO's market model does not use redirect requests or rollover rights, and the Commission has not required the CAISO to do so.

(12) **WEQ OASIS Standards (Improve Efficiencies by Creating a Tracking and Audit Mechanism for Transmission Service Reservations)** – Revisions were made to the WEQ OASIS suite of Business Practice Standards to improve efficiencies by creating a tracking and audit mechanism for transmission service reservations that allows transmission providers and customers to easily assess changes that occur as a result of the preemption and right-of-first-refusal process.³⁹ As explained above, the Commission has granted the CAISO waivers involving transmission reservations as being incompatible with the CAISO's transmission service which does not use negotiations or confirmations related to physical reservations.

(13) **WEQ-024-1 (Cybersecurity)** – The Version 004 NAESB standards reorganize existing cybersecurity business practice standards into a new suite of NAESB standards in WEQ-024.⁴⁰ WEQ-024-1 contains the cybersecurity standards related to OASIS that were originally included in WEQ-001 and WEQ-002 of the Version 003.3 NAESB standards. The Commission has granted the CAISO a waiver from these OASIS related cybersecurity standards.⁴¹

³⁸ Order No. 676-K at P 32.

³⁹ Order No. 676-K at P 33.

⁴⁰ Order No. 676-K at P 38.

⁴¹ *Cal. Indep. Sys. Operator Corp.*, 182 FERC ¶ 61,123 (2023).

Consistent with the CAISO's petition for waiver regarding the Version 003.3 NAESB standards, the OASIS cybersecurity requirements contained in WEQ-024-1 are inapplicable to the CAISO because its market participants do not designate or un-designate resources via OASIS (because the CAISO does not have a traditional "network" transmission service like that offered under the pro forma OATT). Likewise, market participants do not exchange confidential or personal information with the CAISO (and vice-versa) via OASIS. The sole purpose of the CAISO's OASIS is for the CAISO to post public transmission and market operations-related data. All of the information posted on the CAISO's OASIS site is public information and, thus, does not require PKI protection or encryption. Accordingly, CAISO requests a waiver for those OASIS related standards in the WEQ-024-1.

IV. Effective Date

Pursuant to the directives in Order No. 676-K, the CAISO requests that the Commission accept the tariff revisions contained in this filing with an effective date of February 27, 2026 as to the NAESB cybersecurity standards and August 27, 2026 as to the remaining NAESB Version 004 standards.

V. Communications

Under Rule 203(b)(3),⁴² the CAISO respectfully requests that all correspondence and other communications about this filing be served upon:

⁴² 18 C.F.R. § 385.203(b)(3).

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VI. Service

The CAISO 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 CAISO tariff. In addition, the CAISO has posted a copy of the filing on the CAISO website.

VII. Contents of this Filing

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

- | | |
|--------------|---|
| Attachment A | Clean CAISO tariff sheets incorporating the NAESB cybersecurity standards, WEQ Version 004 |
| Attachment B | Red-lined document showing the revisions incorporating the NAESB cybersecurity standards, WEQ Version 004 |
| Attachment C | Clean CAISO tariff sheets incorporating the NAESB standards, WEQ Version 004 |
| Attachment D | Red-lined document showing the revisions incorporating the NAESB standards, WEQ Version 004 |

VIII. Conclusion

For the reasons set forth in this filing, the CAISO respectfully requests that the Commission accept the tariff revisions contained in the filing as compliant with Order No. 676-K, with an effective date of February 27, 2026 as to the NAESB cybersecurity standards and August 27, 2026 as to the remaining NAESB Version 004 standards. The CAISO also respectfully asks that the Commission grant its new waiver requests to comply with parts of Order No. 676-K and its requests to preserve existing waivers.

Respectfully submitted,

/s/ John E. Spomer

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Attachment A – Clean Tariff Sheets re: NAESB Cybersecurity Standards (Feb 27, 2026)

Tariff Amendment – NAESB Standards

California Independent System Operator Corporation

June 24, 2025

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, except to the extent FERC has granted waiver of such NAESB WEQ standards:

- WEQ-000, Abbreviations, Acronyms, and Definition of Terms (WEQ Version 003.1, September 30, 2015) (including only the definitions of Interconnection Time Monitor, Time Error, and Time Error Correction);
- WEQ-000, Abbreviations, Acronyms, and Definition of Terms (excluding the WEQ cybersecurity standards) (WEQ Version 003.3, March 30, 2020);
- WEQ-001, Open Access Same-Time Information Systems (OASIS), (excluding the WEQ cybersecurity standards) (WEQ Version 003.3, March 30, 2020), excluding standards WEQ-001-9 preamble text, WEQ-001-10 preamble text, and exclusively as to standards WEQ-001-13.1.1, 001-13.1.4, 001-13.1.5, 001-16, 001-28-1.3, and 001-28-1.3.1;
- WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocols (S&CP), (excluding the WEQ cybersecurity standards), (WEQ Version 003.3, March 30, 2020);
- WEQ-003, Open Access Same-Time Information Systems (OASIS) Data Dictionary, (WEQ Version 003.3, March 30, 2020);
- WEQ-004, Coordinate Interchange (WEQ Version 003.3, March 30, 2020);
- WEQ-005, Area Control Error (ACE) Equation Special Cases (WEQ Version 003.3, March 30, 2020);
- WEQ-006, Manual Time Error Correction (WEQ Version 003.1, Sept. 30, 2015);
- WEQ-007, Inadvertent Interchange Payback (WEQ Version 003.3, March 30, 2020);
- WEQ-008, Transmission Loading Relief (TLR)—Eastern Interconnection (WEQ Version 003.3, March 30, 2020);
- WEQ-011, Gas/ Electric Coordination (WEQ Version 003.3, March 30, 2020);
- WEQ-012, Public Key Infrastructure (PKI) (WEQ Version 003.3, March 30, 2020);

- WEQ-013, Open Access Same-Time Information Systems (OASIS) Implementation Guide, (WEQ Version 003.3, March 30, 2020);
- WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response (WEQ Version 003.3, March 30, 2020);
- WEQ-021, Measurement and Verification of Energy Efficiency Products (WEQ Version 003.3, March 30, 2020);
- WEQ-022, Electric Industry Registry (WEQ Version 003.3, March 30, 2020);
- WEQ-023, Modeling. (WEQ Version 003.3, March 30, 2020); and
- WEQ-024, Cybersecurity (WEQ Version 004, July 31, 2023).

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

- WEQ-001, Open Access Same-Time Information Systems (OASIS), (WEQ Version 003.3, March 30, 2020), excluding standards WEQ-001-9 preamble text, WEQ-001-10 preamble text, and except as set forth above;
- WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocols (S&CP), (WEQ Version 003.3, March 30, 2020);
- WEQ-003, Open Access Same-Time Information Systems (OASIS) Data Dictionary, (WEQ Version 003.3, March 30, 2020);
- WEQ-006, Manual Time Error Correction, (WEQ Version 003.1, Sept. 30, 2015) and only as to standards WEQ-006-5 and 006-9;
- WEQ-012, Public Key Infrastructure (PKI), (WEQ Version 003.3, March 30, 2020) to the extent it applies to OASIS applications;
- WEQ-013, Open Access Same-Time Information Systems (OASIS) Implementation Guide, (WEQ Version 003.3, March 30, 2020);
- WEQ-023, Modeling, (WEQ Version 003.3, March 30, 2020) and only as to standards WEQ-023-5; WEQ-023-5.1; WEQ-023-5.1.1; WEQ-023-5.1.2; WEQ-023-5.1.2.1; WEQ-023-5.1.2.2; WEQ-023-5.1.2.3; WEQ-023-5.1.3; WEQ-023-5.2; WEQ-023-6; WEQ-023-6.1; WEQ-023-6.1.1; WEQ-023-6.1.2; and WEQ-023-A Appendix A; and
- WEQ-024, Cybersecurity (WEQ Version 004, July 31, 2023) and only as to standard WEQ-024-1.

Attachment B – Marked Tariff Sheets re: NAESB Cybersecurity Standards (Feb 27, 2026)

Tariff Amendment – NAESB Standards

California Independent System Operator Corporation

June 24, 2025

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, except to the extent FERC has granted waiver of such NAESB WEQ standards:

- WEQ-000, Abbreviations, Acronyms, and Definition of Terms (WEQ Version 003.1, September 30, 2015) (including only the definitions of Interconnection Time Monitor, Time Error, and Time Error Correction);
- WEQ-000, Abbreviations, Acronyms, and Definition of Terms (excluding the WEQ cybersecurity standards) (WEQ Version 003.3, March 30, 2020);
- WEQ-001, Open Access Same-Time Information Systems (OASIS), (excluding the WEQ cybersecurity standards) (WEQ Version 003.3, March 30, 2020), excluding standards WEQ-001-9 preamble text, WEQ-001-10 preamble text, and exclusively as to standards WEQ-001-13.1.1, 001-13.1.4, 001-13.1.5, 001-16, 001-28-1.3, and 001-28-1.3.1;
- WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocols (S&CP), (excluding the WEQ cybersecurity standards), (WEQ Version 003.3, March 30, 2020);
- WEQ-003, Open Access Same-Time Information Systems (OASIS) Data Dictionary, (WEQ Version 003.3, March 30, 2020);
- WEQ-004, Coordinate Interchange (WEQ Version 003.3, March 30, 2020);
- WEQ-005, Area Control Error (ACE) Equation Special Cases (WEQ Version 003.3, March 30, 2020);
- WEQ-006, Manual Time Error Correction (WEQ Version 003.1, Sept. 30, 2015);
- WEQ-007, Inadvertent Interchange Payback (WEQ Version 003.3, March 30, 2020);
- WEQ-008, Transmission Loading Relief (TLR)—Eastern Interconnection (WEQ Version 003.3, March 30, 2020);
- WEQ-011, Gas/ Electric Coordination (WEQ Version 003.3, March 30, 2020);
- WEQ-012, Public Key Infrastructure (PKI) (WEQ Version 003.3, March 30, 2020);

- WEQ-013, Open Access Same-Time Information Systems (OASIS) Implementation Guide, (WEQ Version 003.3, March 30, 2020);
- WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response (WEQ Version 003.3, March 30, 2020);
- WEQ-021, Measurement and Verification of Energy Efficiency Products (WEQ Version 003.3, March 30, 2020);
- WEQ-022, Electric Industry Registry (WEQ Version 003.3, March 30, 2020); ~~and~~
- WEQ-023, Modeling. (WEQ Version 003.3, March 30, 2020); ~~and~~
- WEQ-024, Cybersecurity (WEQ Version 004, July 31, 2023).

~~Pursuant to FERC's Order on Compliance and Request for Waivers, Docket Nos ER23-426-003 and ER23-427-002 (October 26, 2023), the CAISO has been granted~~ The CAISO has applied for a waiver of the following NAESB WEQ standards:

- WEQ-001, Open Access Same-Time Information Systems (OASIS), (WEQ Version 003.3, March 30, 2020), excluding standards WEQ-001-9 preamble text, WEQ-001-10 preamble text, and except as set forth above;
- WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocols (S&CP), (WEQ Version 003.3, March 30, 2020);
- WEQ-003, Open Access Same-Time Information Systems (OASIS) Data Dictionary, (WEQ Version 003.3, March 30, 2020);
- WEQ-006, Manual Time Error Correction, (WEQ Version 003.1, Sept. 30, 2015) and only as to standards WEQ-006-5 and 006-9;
- WEQ-012, Public Key Infrastructure (PKI), (WEQ Version 003.3, March 30, 2020) to the extent it applies to OASIS applications;
- WEQ-013, Open Access Same-Time Information Systems (OASIS) Implementation Guide, (WEQ Version 003.3, March 30, 2020); ~~and~~
- WEQ-023, Modeling, (WEQ Version 003.3, March 30, 2020) and only as to standards WEQ-023-5; WEQ-023-5.1; WEQ-023-5.1.1; WEQ-023-5.1.2; WEQ-023-5.1.2.1; WEQ-023-5.1.2.2; WEQ-023-5.1.2.3; WEQ-023-5.1.3; WEQ-023-5.2; WEQ-023-6; WEQ-023-6.1; WEQ-023-6.1.1; WEQ-023-6.1.2; and WEQ-023-A Appendix A; and
- WEQ-024, Cybersecurity (WEQ Version 004, July 31, 2023) and only as to standard WEQ-024-1.

Attachment C – Clean Tariff Sheets re: NAESB Version 004 standards (Aug 27, 2026)

Tariff Amendment – NAESB Standards

California Independent System Operator Corporation

June 24, 2025

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, except to the extent FERC has granted waiver of such NAESB WEQ standards:

- WEQ-000, Abbreviations, Acronyms, and Definition of Terms (Version 004, July 31, 2023);
- WEQ-001, Open Access Same-Time Information Systems (OASIS) (WEQ Version 004, July 31, 2023), with Minor Correction MC24004 applied to standard WEQ-001-24.2.4 (August 9, 2024), and excluding standards WEQ-001-9 preamble text, WEQ-001-10 preamble text, and exclusively as to standards WEQ-001-13.1.1, 001-13.1.4, 001-13.1.5, 001-16, 001-28-1.3, and 001-28-1.3.1;
- WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocols (S&CP) (WEQ Version 004, July 31, 2023);
- WEQ-003, Open Access Same-Time Information Systems (OASIS) Data Dictionary (WEQ Version 004, July 31, 2023);
- WEQ-004, Coordinate Interchange (WEQ Version 004, July 31, 2023);
- WEQ-005, Area Control Error (ACE) Equation Special Cases (WEQ Version 004, July 31, 2023);
- WEQ-006, Manual Time Error Correction (WEQ Version 004, July 31, 2023);
- WEQ-007, Inadvertent Interchange Payback (WEQ Version 004, July 31, 2023);
- WEQ-008, Transmission Loading Relief (TLR)—Eastern Interconnection (WEQ Version 004, July 31, 2023);
- WEQ-011, Gas/ Electric Coordination (WEQ Version 004, July 31, 2023);
- WEQ-012, Public Key Infrastructure (PKI) (WEQ Version 004, July 31, 2023);

- WEQ-013, Open Access Same-Time Information Systems (OASIS) Implementation Guide (WEQ Version 004, July 31, 2023);
- WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response (WEQ Version 004, July 31, 2023);
- WEQ-021, Measurement and Verification of Energy Efficiency Products (WEQ Version 004, July 31, 2023);
- WEQ-022, Electric Industry Registry (EIR) (WEQ Version 004, July 31, 2023);
- WEQ-023, Modeling (WEQ Version 004, July 31, 2023);
- WEQ-024, Cybersecurity (WEQ Version 004, July 31, 2023).

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

- WEQ-001, Open Access Same-Time Information Systems (OASIS) (WEQ Version 004, July 31, 2023), excluding standards WEQ-001-9 preamble text, WEQ-001-10 preamble text, and except as set forth above;
- WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocols (S&CP) (WEQ Version 004, July 31, 2023);
- WEQ-003, Open Access Same-Time Information Systems (OASIS) Data Dictionary (WEQ Version 004, July 31, 2023);
- WEQ-012, Public Key Infrastructure (PKI) (WEQ Version 004, July 31, 2023) to the extent it applies to OASIS applications;
- WEQ-013, Open Access Same-Time Information Systems (OASIS) Implementation Guide (WEQ Version 004, July 31, 2023);
- WEQ-023, Modeling (WEQ Version 004, July 31, 2023) and only as to standards WEQ-023-1.4; WEQ-023-5; WEQ-023-5.1; WEQ-023-5.1.1; WEQ-023-5.1.2; WEQ-023-5.1.2.1; WEQ-023-5.1.2.2; WEQ-023-5.1.2.3; WEQ-023-5.1.3; WEQ-023-5.2; WEQ-023-6; WEQ-023-6.1; WEQ-023-6.1.1; WEQ-023-6.1.2; and WEQ-023-A Appendix A;
- WEQ-024, Cybersecurity (WEQ Version 004, July 31, 2023) and only as to standard WEQ-024-1.

Attachment D – Marked Tariff Sheets re: NAESB Version 004 standards (Aug 27, 2026)

Tariff Amendment – NAESB Standards

California Independent System Operator Corporation

June 24, 2025

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, except to the extent FERC has granted waiver of such NAESB WEQ standards:

- ~~WEQ-000, Abbreviations, Acronyms, and Definition of Terms (WEQ Version 003-1, September 30, 2015) (including only the definitions of Interconnection Time Monitor, Time Error, and Time Error Correction);~~
- WEQ-000, Abbreviations, Acronyms, and Definition of Terms (~~WEQ~~ Version 0043-3, ~~March July 310~~, 20230);
- WEQ-001, Open Access Same-Time Information Systems (OASIS); (~~WEQ~~ Version 0043-3, ~~March-July 310~~, 20230), with Minor Correction MC24004 applied to standard WEQ-001-24.2.4 (August 9, 2024), and excluding standards WEQ-001-9 preamble text, WEQ-001-10 preamble text, and exclusively as to standards WEQ-001-13.1.1, 001-13.1.4, 001-13.1.5, 001-16, 001-28-1.3, and 001-28-1.3.1;
- WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocols (S&CP); (~~WEQ~~ Version 0043-3, ~~March-July 310~~, 20230);
- WEQ-003, Open Access Same-Time Information Systems (OASIS) Data Dictionary; (~~WEQ~~ Version 0043-3, ~~March-July 310~~, 20230);
- WEQ-004, Coordinate Interchange (~~WEQ~~ Version 0043-3, ~~JulyMarch 310~~, 20230);
- WEQ-005, Area Control Error (ACE) Equation Special Cases (~~WEQ~~ Version 0043-3, ~~JulyMarch 310~~, 20230);
- WEQ-006, Manual Time Error Correction (~~WEQ~~ Version 0043-1, ~~JulySept. 310~~, 202315);
- WEQ-007, Inadvertent Interchange Payback (~~WEQ~~ Version 0043-3, ~~JulyMarch 310~~, 20230);
- WEQ-008, Transmission Loading Relief (TLR)—Eastern Interconnection (~~WEQ~~ Version 0043-3, ~~March-July 310~~, 20230);
- WEQ-011, Gas/ Electric Coordination (~~WEQ~~ Version 0043-3, ~~JulyMarch 310~~, 20230);
- WEQ-012, Public Key Infrastructure (PKI) (~~WEQ~~ Version 0043-3, ~~JulyMarch 310~~, 20230);

- WEQ-013, Open Access Same-Time Information Systems (OASIS) Implementation Guide; (WEQ Version 00~~43-3~~, ~~March-July 310~~, 202~~30~~);
- WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response (WEQ Version 00~~43-3~~, ~~JulyMarch 310~~, 202~~30~~);
- WEQ-021, Measurement and Verification of Energy Efficiency Products (WEQ Version 00~~43-3~~, ~~March-July 310~~, 202~~30~~);
- WEQ-022, Electric Industry Registry (EIR) (WEQ Version 00~~43-3~~, ~~March-July 310~~, 202~~30~~); ~~and~~
- WEQ-023, Modeling; (WEQ Version 00~~43-3~~, ~~JulyMarch 310~~, 202~~30~~); ~~and~~
- WEQ-024, Cybersecurity (WEQ Version 004, July 31, 2023).

~~Pursuant to FERC's Order on Compliance and Request for Waivers, Docket Nos ER23-426-003 and ER23-427-002 (October 26, 2023), the CAISO has been granted~~ The CAISO has applied for a waiver of the following NAESB WEQ standards:

- WEQ-001, Open Access Same-Time Information Systems (OASIS); (WEQ Version 00~~43-3~~, ~~JulyMarch 310~~, 202~~30~~), excluding standards WEQ-001-9 preamble text, WEQ-001-10 preamble text, and except as set forth above;
- WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocols (S&CP); (WEQ Version 00~~43-3~~, ~~March-July 310~~, 202~~30~~);
- WEQ-003, Open Access Same-Time Information Systems (OASIS) Data Dictionary; (WEQ Version 00~~43-3~~, ~~JulyMarch 310~~, 202~~30~~);
- WEQ-012, Public Key Infrastructure (PKI); (WEQ Version 00~~43-3~~, ~~March-July 310~~, 202~~30~~) to the extent it applies to OASIS applications;
- WEQ-013, Open Access Same-Time Information Systems (OASIS) Implementation Guide; (WEQ Version 00~~43-3~~, ~~JulyMarch 310~~, 202~~30~~); ~~and~~
- WEQ-023, Modeling; (WEQ Version 00~~43-3~~, ~~March-July 310~~, 202~~30~~) and only as to standards WEQ-023-1.4; WEQ-023-5; WEQ-023-5.1; WEQ-023-5.1.1; WEQ-023-5.1.2; WEQ-023-5.1.2.1; WEQ-023-5.1.2.2; WEQ-023-5.1.2.3; WEQ-023-5.1.3; WEQ-023-5.2; WEQ-023-6; WEQ-023-6.1; WEQ-023-6.1.1; WEQ-023-6.1.2; and WEQ-023-A Appendix A; ~~and~~
- WEQ-024, Cybersecurity (WEQ Version 004, July 31, 2023) and only as to standard WEQ-024-1.