



California Independent
System Operator Corporation

November 14, 2022

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

**Re: California Independent System Operator Corporation
Amended Filing to Comply with Order No. 676-J
Docket Nos. ER23-____-000; RM05-5-029; RM05-5-030**

Dear Secretary Bose:

The California Independent System Operator Corporation (CAISO)¹ submits this amended filing in compliance with the Commission's Order No. 676-J.² In Order No. 676-J, the Commission directed public utilities, including the CAISO, to incorporate in their jurisdictional tariffs the latest versions of the 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-J requires substantive CAISO tariff revisions for implementation. The CAISO accordingly requests that the Commission accept the enclosed revisions to incorporate the NAESB standards into the tariff by reference, with an open-ended effective date.³

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

² *Standards for Bus. Practices & Comm'n Protocols for Pub. Utils.*, Order No. 676-J, 175 FERC ¶ 61,139 (2021) (Order No. 676-J). The CAISO submits this filing so that its proposed tariff changes in Attachments A and B are consistent with the description of the NAESB standards set forth in Order No. 676-J.

³ As discussed below, the CAISO is also filing a request for waiver of some of the NAESB standards. The CAISO is also submitting this filing with an open-ended effective date of 12/31/9998 and will file an informational filing with filing code type 150 within five business days of the actual effective date.

I. Background

In Order No. 676-J, the Commission amended its regulations to incorporate by reference the latest version (Version 003.3) of specified business practice standards that NAESB filed with the Commission on March 30, 2020. The Version 003.3 NAESB standards include updates to standards that the Commission previously incorporated by reference into its regulations.

The Version 003.3 standards include revisions related to the surety assessment on cybersecurity performed by Sandia National Laboratories (Sandia) designed to strengthen the practices and cybersecurity protections established within the standards.⁴ The standards also include revisions to support new OASIS functionality that will allow for the posting of third party offers of planning redispatch services as well as providing additional information regarding the curtailment of firm transmission service.⁵ The standards also include changes that were made to support consistency with the North American Electric Reliability Corporation (NERC) Reliability Standards.⁶ The standards also include additions, revisions, and reservations made to the WEQ-008 Transmission Load Relief (TLR) – Eastern Interconnection Business Practice Standards, which NAESB advises completes the standards development effort for the Parallel Flow Visualization (PFV) enhanced congestion management process (PFV Standards).⁷ The standards also include five additional revisions to the OASIS suite of standards that were not made in response to Commission orders.⁸ In addition, the standards include revisions to the NAESB WEQ-023 Modeling Business Practice Standards.⁹ Finally, the Commission also revised 18 CFR § 37.6(b)(2)(i) to codify that the calculation of Available Transfer Capability (ATC) must be conducted in manner that is transparent, consistent with system conditions and outages for the relevant timeframe, and not unduly discriminatory or preferential.¹⁰

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

⁴ Order No. 676-J at P 11.

⁵ *Id.* at P 12.

⁶ *Id.* at P 13.

⁷ *Id.* at P 14.

⁸ *Id.* at P 15.

⁹ *Id.* at P 16.

¹⁰ *Id.* at P 38.

- 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 003.3, March 30, 2020);
- WEQ–001, Open Access Same-Time Information Systems (OASIS), (WEQ Version 003.3, March 30, 2020);
- 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–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).¹¹

The Commission directed public utilities to submit their Order No. 676-J compliance filings by October 27, 2022, and to make the OATT revisions in those filings using an open-ended effective date.¹²

II. Proposed Tariff Revisions

Adoption of the NAESB standards set forth in Order No. 676-J does not require any substantive changes or revisions to the existing provisions of the CAISO tariff. Therefore, in accordance with Order No. 676-J, the CAISO has revised section 7.3.3 of its tariff to incorporate those NAESB standards by reference, using the referencing language prescribed in Order 676-J and replicated in Section I above.

The CAISO also has revised tariff section 7.3.3 to list the NAESB standards for which the CAISO has requested waiver, pursuant to the petition for waiver it is submitting the same day as this compliance filing.

III. Effective Date

Pursuant to the directives in Order No. 676-J, the CAISO requests that the Commission accept the tariff revisions contained in this filing with an open-ended effective date.

IV. Communications

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

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¹¹ *Id.* at PP 53-68. The Commission also incorporated those NAESB standards into its regulations by reference. *Id.*

¹² *See id.* at P 51.

V. Service

The CAISO has served copies of this amended 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.

VI. Contents of this Filing

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

Attachment A	Clean CAISO tariff sheets 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 amended filing, the CAISO respectfully requests that the Commission accept the tariff revisions contained in the filing as compliant with Order No. 676-J, with an open-ended effective date.

Respectfully submitted,

/s/ John E. Spomer

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Counsel for the California Independent System Operator Corporation

Attachment A – Clean Tariff

NAESB Standards – Compliance Filing

California Independent System Operator Corporation

November 14, 2022

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 003.3, March 30, 2020);
- 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 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 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).

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.

Attachment B – Marked Tariff
NAESB Standards – Compliance Filing
California Independent System Operator Corporation
November 14, 2022

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 ~~(, standard WEQ-000-2 (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 003.3, March 30, 2020, Dec. 8, 2017)~~ (with minor correction applied July 23, 2019);
- WEQ-001, Open Access Same-Time Information Systems (OASIS), ~~(OASIS) Version 2.2 (WEQ) Version 003.3, March 30, 2020, Dec. 8, 2017)~~, 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 001-28-1.3.146;
- WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocols (S&CP), ~~(OASIS) Version 2.2 (WEQ) Version 003.3, March 30, 2020, Dec. 8, 2017)~~;
- WEQ-003, Open Access Same-Time Information Systems (OASIS) Data Dictionary, ~~(WEQ OASIS) Version 003.3, March 30, 2020, Dec. 8, 2017)~~ (with minor corrections applied July 23, 2019);
- WEQ-004, Coordinate Interchange ~~(WEQ) Version 003.3, March 30, 2020, Dec. 8, 2017)~~;
- WEQ-005, Area Control Error (ACE) Equation Special Cases ~~(WEQ) Version 003.3, March 30, 2020, Dec. 8, 2017)~~;
- 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, Dec. 8, 2017)~~;
- WEQ-008, Transmission Loading Relief (TLR) ~~(WEQ) Eastern Interconnection (WEQ) Version 003.3, March 30, 2020, Dec. 8, 2017)~~;
- WEQ-011, Gas-/ Electric Coordination ~~(WEQ) Version 003.3, March 30, 2020, Dec. 8, 2017)~~;
- WEQ-012, Public Key Infrastructure (PKI) ~~(WEQ) Version 003.3, March 30, 2020, Dec. 8, 2017)~~;

- WEQ-013, Open Access Same-Time Information Systems (OASIS) Implementation Guide, ~~([OASIS] Version 2.2 ([WEQ] Version 003.3, March 30, 2020, Dec. 8, 2017);~~
- WEQ-015, Measurement and Verification of Wholesale Electricity Demand Response ~~([WEQ] Version 003.3, March 30, 2020);2, Dec. 8, 2017);~~
- WEQ-021, Measurement and Verification of Energy Efficiency Products ~~([WEQ] Version 003.3, March 30, 2020, Dec. 8, 2017);~~
- WEQ-022, Electric Industry Registry ~~([WEQ] Version 003.3, March 30, 2020, Dec. 8, 2017); and~~
- WEQ-023, Modeling. (WEQ Version 003.3, March 30, 2020).

~~1. The CAISO has applied for WEQ 023, Modeling ([WEQ] Version 003.2, Dec. 8, 2017), including only: 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.~~

~~Pursuant to FERC's Order on Compliance and Request for Waivers, Docket Nos. ER21-2495-000 and ER21-2496-001 (March 7, 2022), the CAISO has been granted a waiver of the following NAESB WEQ standards:~~

- ~~1. WEQ-001, Open Access Same-Time Information Systems (OASIS), ([OASIS] Version 2.2 ([WEQ] Version 003.3, March 30, 2020, Dec. 8, 2017), excluding standards WEQ-001-9 preamble text, WEQ-001-10 preamble text, and except as set forth above;~~
- ~~2. WEQ-002, Open Access Same-Time Information Systems (OASIS) Business Practice Standards and Communication Protocols (S&CP), ([OASIS] Version 2.2 ([WEQ] Version 003.3, March 30, 2020, Dec. 8, 2017);~~
- ~~3. WEQ-003, Open Access Same-Time Information Systems (OASIS) Data Dictionary, ([OASIS] Version 2.2 ([WEQ] Version 003.3, March 30, 2020, Dec. 8, 2017) (with minor corrections applied July 23, 2019);~~
- ~~4. WEQ-006, Manual Time Error Correction, ([WEQ] Version 003.1, Sept. 30, 2015) and only as to standards WEQ-006-5 and 006-9;~~
- ~~5. WEQ-012, Public Key Infrastructure (PKI), ([WEQ] Version 003.3, March 30, 2020, Dec. 8, 2017) to the extent it applies to OASIS applications;~~

6.● WEQ-013, Open Access Same-Time Information Systems (OASIS) Implementation

Guide, ~~([OASIS] Version 2.2 ([WEQ] Version 003.3, March 30, 2020); 2, Dec 8, 2017);~~
and

- WEQ-023, Modeling, ~~([WEQ] Version 003.3, March 30, 2020) and 2, Dec. 8, 2017),~~
~~including~~ 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.