



California Independent
System Operator Corporation

November 20, 2023

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-J
Docket Nos. ER23-426-____; RM05-5-029; RM05-5-030**

Dear Secretary Bose:

The California Independent System Operator Corporation (CAISO)¹ submits this filing in compliance with the Commission's Order on Compliance and Request for Waivers², issued October 26, 2023. In Order No. 676-J³, 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.

On May 3, 2023, the CAISO filed for waiver of certain of these standards, which the Commission granted in its Waiver Order. As part of that order, the Commission directed the CAISO to make a compliance filing within 30 days of the date of the order, to revise section 7.3.3 of its tariff to indicate those Business Practice Standards for which the Commission has granted waiver, and for each of those Business Practice

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

² *Order on Compliance and Request for Waivers*, Docket Nos. ER23-426-003 and ER23-427-002 (October 26, 2023), 185 FERC ¶ 61,072 ("Waiver Order").

³ *Standards for Bus. Practices & Comm'n Protocols for Pub. Utils.*, Order No. 676-J, 175 FERC ¶ 61,139 (2021) (Order No. 676-J). The Commission previously accepted the CAISO's compliance filing with respect to the cybersecurity and Parallel Flow Visualization standards adopted in Order No. 676-J. The CAISO submits this filing so that its proposed tariff changes in Attachments A and B are consistent with the remaining NAESB standards adopted in Order No. 676-J.

Standards granted waiver, to include a citation to the order granting the request for waivers.⁴

The CAISO accordingly requests that the Commission accept the enclosed tariff revisions in compliance with the Commission's Waiver Order, effective February 1, 2024.

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.⁵ 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.⁶ The standards also include changes that were made to support consistency with the North American Electric Reliability Corporation (NERC) Reliability Standards.⁷ 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).⁸ The standards also include five additional revisions to the OASIS suite of standards that were not made in response to Commission orders.⁹ In addition, the standards include revisions to the NAESB WEQ-023 Modeling Business Practice Standards.¹⁰ Finally, the Commission also revised 18 CFR § 37.6(b)(2)(i) to codify that

⁴ Waiver Order at P 13.

⁵ Order No. 676-J at P 11.

⁶ *Id.* at P 12.

⁷ *Id.* at P 13.

⁸ *Id.* at P 14.

⁹ *Id.* at P 15.

¹⁰ *Id.* at P 16.

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.¹¹

Order No. 676-J required public utilities to revise their open access transmission tariffs to include the WEQ Version 003.3 Standards in two separate compliance filings. Specifically, public utilities were required to submit compliance filings for the WEQ cybersecurity standards and the PFV standards nine months after the publication of Order No. 676-J in the Federal Registry. On November 14, 2022, as amended on January 24, 2023, the CAISO submitted its compliance filing and waiver petition regarding these standards. On February 23, 2023, the Commission issued an order accepting the CAISO's compliance filing and granting its request for waivers.¹²

Public utilities' compliance filings for the rest of the WEQ Version 003.3 Standards were due twelve months after implementation of the WEQ Version 003.2 Standards, or no earlier than October 27, 2022. On May 3, 2023, the CAISO submitted its compliance filing regarding these remaining standards. The CAISO also submitted a waiver petition regarding certain of these standards. On October 6, 2023, the Commission issued its Waiver Order, granting CAISO's request for waivers. The Commission directed the CAISO to make a compliance filing, within 30 days of the date of the Waiver Order, to revise section 7.3.3 of its tariff to indicate those standards for which the Commission has granted waiver, and for each of those standards granted waiver, to include a cite to the order granting the waiver requests. This compliance filing addresses these directives.

II. Proposed Tariff Revisions

In accordance with Order No. 676-J, the CAISO has revised tariff section 7.3.3 to incorporate by reference the remaining standards in Version 003.3, other than those standards for which it has been granted a waiver. The CAISO also has incorporated by reference WEQ-008; however, this standard is inapplicable to the CAISO because it does not reside in the Eastern Interconnection. The CAISO has revised tariff section 7.3.3 to list the WEQ-001, WEQ-002, WEQ-003, WEQ-012, WEQ-013, and WEQ-023 standards for which the CAISO has been granted a waiver and citing the Commission's Waiver Order, issued October 26, 2023. Adoption of the remaining NAESB standards in Order No. 676-J does not require any substantive changes or revisions to the existing provisions of the CAISO tariff.

¹¹ *Id.* at P 38.

¹² *Order on Compliance and Request for Waivers*, Docket Nos. ER23-426-001, ER23-427-000 and ER23-427-001 (February 23, 2023), 182 FERC ¶ 61,123.

III. Effective Date

Pursuant to the directives in the Waiver Order, the CAISO requests that the Commission accept the tariff revisions contained in this filing with an effective date of February 1, 2024.

IV. Communications

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

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V. Contents of this Filing

In addition to this transmittal letter, this 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 |

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VI. 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 the Waiver Order, and effective as of February 1, 2024.

Respectfully submitted,

/s/ John E. Spomer

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Counsel for the California Independent
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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 20 day of November, 2023.

/s/ Jacqueline Meredith

Jacqueline Meredith
An employee of the California ISO

Attachment A – Clean Tariff
NAESB Standards – Compliance Filing
California Independent System Operator Corporation
November 20, 2023

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).

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 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 20, 2023

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).

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 ~~applied for~~ been granted 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.