



November 29, 2023

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

**Re: California Independent System Operator Corporation**

**Compliance Filing with Commission Order on Transmission Service and Market Scheduling Priorities Initiative – Framework for Obtaining Wheeling Through Self-Schedule Priorities On a Monthly and Daily Basis**

**Docket No. ER23-2510-\_\_\_\_**

Dear Secretary Bose:

The California Independent System Operator Corporation (CAISO) submits this filing in compliance with the Federal Energy Regulatory Commission's Order Accepting Tariff Revisions, Subject to Condition issued on October 30, 2023 in the captioned docket.<sup>1</sup> The CAISO requests that the Commission accept the tariff records submitted with this filing as compliant with the October 30 Order.

## **I. Background**

On July 28, 2023, the CAISO submitted a tariff amendment in this proceeding to implement a framework for external entities to obtain, in advance, on a monthly and daily basis, wheeling through self-schedule priorities equal to the scheduling priority of CAISO demand, as well as related updates to CAISO's calculation of Available Transfer Capability. As part of its filing, the CAISO proposed to retain the scheduling run priority provisions for wheeling transactions set forth in sections 31.4, 34.12, 34.12.1, and 34.12.2 of its tariff beyond June 1, 2024. In its October 30 Order, the Commission accepted the CAISO's tariff revisions and directed the CAISO to make a compliance filing by November 29, 2023 to remove the expiration date for the scheduling run priority provisions for wheeling transactions. The

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<sup>1</sup> *Cal. Indep. Sys. Operator Corp.*, 185 FERC ¶ 61,085 (2023) (October 30 Order).

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scheduling run priority provisions for wheeling transactions provisions set forth in sections 31.4, 34.12, 34.12.1, and 34.12.2 are currently effective and will remain in effect beyond June 1, 2024. In compliance with the Commission's October 30 Order, the CAISO is resubmitting these tariff records with this compliance filing.

## II. Materials Provided in this Compliance Filing

In addition to this transmittal letter, this compliance filing includes:

Attachment A	Clean CAISO tariff sheets reflecting the tariff revisions described above
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## III. Conclusion

The CAISO requests that the Commission accept this filing in full compliance with the Commission's October 30 Order.

Respectfully submitted,

**By: /s/ Andrew Ulmer**

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Counsel for the California Independent  
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Dated: November 29, 2023

## 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 29th day of November 2023.

*/s/ Jacqueline Meredith*

Jacqueline Meredith  
An employee of the California ISO

**Attachment A – Clean Tariff**  
**Compliance Filing – Short-Term Wheeling Through**  
**California Independent System Operator Corporation**  
**November 29, 2023**

## **Section 31**

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### **31.4 CAISO Market Adjustments To Non-Priced Quantities In The IFM**

All Self-Schedules are respected by SCUC to the maximum extent possible and are protected from curtailment in the Congestion Management process to the extent that there are Effective Economic Bids that can relieve Congestion. If all Effective Economic Bids in the IFM are exhausted, resource Self-Schedules between the resource's Minimum Load as defined in the Master File, or if applicable, as modified pursuant to Section 9.3.3, and the first Energy level of the first Energy Bid point will be subject to adjustments by the CAISO Market optimization based on the scheduling priorities listed below. This functionality of the optimization software is implemented through the setting of scheduling parameters as described in Section 27.4.3 and specified in Section 27.4.3.1 and the Business Practice Manuals. Through this process, imports and exports may be reduced to zero, Demand Bids may be reduced to zero, Price Taker Demand (LAP load) may be reduced, and Generation may be reduced to a lower operating limit (or Regulation Limit) (or to a lower Regulation Limit plus any qualified Regulation Down award or Self-Provided Ancillary Services, if applicable). Any Self-Schedules below the Minimum Load level are treated as fixed Self-Schedules and are not subject to these adjustments for Congestion Management. The provisions of this section shall apply only to the extent they do not conflict with any MSS Agreement. In accordance with Section 27.4.3.5, the resources submitted in valid TOR, ETC or Converted Rights Self-Schedules shall not be adjusted in the IFM in response to an insufficiency of Effective Economic Bids. Thus the adjustment sequence for the IFM from highest priority (last to be adjusted) to lowest priority (first to be adjusted), is as follows:

<b>Scheduling Run Priority</b>	<b>Scheduling Run Parameters Under Soft Energy Bid Cap (27.4.3.2)</b>	<b>Scheduling Run Parameters Under Hard Energy Bid Cap (27.4.3.3)</b>
Reliability Must Run (RMR) Generation pre-dispatch reduction	-\$6000	-\$12000
Day-Ahead TOR Self-Schedules reduction (balanced demand and supply reduction)	\$5,900 (demand)/ - \$5,900 (supply)	\$11800 (demand)/ -\$11800 (supply)
Day-Ahead ETC and Converted Rights Self-Schedules reduction; different ETC priority levels will be observed based upon global ETC priorities provided to the CAISO by the Responsible PTOs	\$5100 to \$5900 (demand)/ -\$5100 to -\$5900 (supply)	\$10200 to \$11800 (demand)/ -\$10200 to -\$11800 (supply)
Internal Transmission Constraint relaxation for the IFM pursuant to Section 27.4.3.1	\$5000	\$10000
The export Self-Schedule of a Priority Wheeling Through; Self-Schedules of CAISO Demand reduction subject to Section 31.3.1.3; exports explicitly identified in a Resource Adequacy Plan to be served by Resource Adequacy Capacity explicitly identified and linked in a Supply Plan to the exports; and Self-Schedules of exports at Scheduling Points explicitly sourced by non-Resource Adequacy Capacity	\$1800	\$3600
Self-Schedules of exports at Scheduling Points not explicitly sourced by non-Resource Adequacy Capacity, except those exports explicitly identified in a Resource Adequacy Plan to be served by Resource Adequacy Capacity explicitly identified and linked in a Supply Plan to the exports as set forth in Section 31.4(d), and the export Self-Schedule of a non-Priority Wheeling Through	\$1050	\$2100
Day-Ahead Regulatory Must-Run Generation and Regulatory Must-Take Generation reduction	-\$1350	-\$2700
Other Self-Schedules of Supply reduction, and the import Self-Schedule of a Priority Wheeling Through	-\$1100	-\$2200
The import Self-Schedule of a non-Priority Wheeling Through	\$0	\$0

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## **Section 34**

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### **34.12 CAISO Market Adjustment To Non-Priced Quantities In The RTM**

All Self-Schedules are respected by the SCED and SCUC to the maximum extent possible and are protected from curtailment in the Congestion Management process to the extent that there are effective Economic Bids that can relieve Congestion. If all Effective Economic Bids for the RTM are exhausted, all Self-Schedules between the Minimum Load and the lowest Energy level of the first Energy Bid point will be subject to uneconomic adjustments based on assigned scheduling priorities. This functionality of the optimization software is implemented through the setting of scheduling parameters as described in Section 27.4.3 and specified in Section 27.4.3.1 and the BPMs. Through this process, imports and exports may be reduced to zero, Demand may be reduced to zero, and Generation may be reduced to a lower operating limit (or Regulation Limit) (or to a lower Regulation Limit plus any qualified Regulation Down Award or Self-Provided Ancillary Services, if applicable). Any Self-Schedules below the Minimum Load level are treated as fixed Self-Schedules and are not subject to uneconomic adjustments for Congestion Management but may be subject to decommitment via an Exceptional Dispatch if necessary as a last resort to relieve Congestion that could not otherwise be managed.

### 34.12.1 Increasing Supply

The scheduling priorities as defined in the RTM optimization to meet the need for increasing Supply as reflected from higher to lower priority are as follows:

<b>Scheduling Run Priority</b>	<b>Scheduling Parameters Under Soft Energy Bid Cap (27.4.3.2)</b>	<b>Scheduling Parameters Under Hard Energy Bid Cap (27.4.3.3)</b>
CAISO Forecast of CAISO Demand; the export Self-Schedule of a Priority Wheeling Through; exports explicitly identified in a Resource Adequacy Plan backed by Resource Adequacy Capacity explicitly identified and linked in a Supply Plan to the exports; or Self-Schedules for exports at Scheduling Points backed by Generation from non-Resource Adequacy Capacity or from non-RUC Capacity	\$1450	\$2900
RUC Schedules that are Self-Schedules of exports at Scheduling Points not backed by Generation from non-Resource Adequacy Capacity, or the RUC Schedules that are the export Self-Schedules of non-Priority Wheeling Throughs	\$1250	\$2500
Real-Time Market Self-Schedules of exports at Scheduling Points not backed by Generation from non-Resource Adequacy Capacity or non-RUC capacity, or the Real-Time Market Self-Schedules that are the export Self-Schedules of a non-Priority Wheeling Through	\$1150	\$2300
Contingency Only Operating Reserve if activated by Operator to provide Energy (as indicated by the Contingency Flag and the Contingency condition)	\$1000	\$2000

### 34.12.2 Decreasing Supply

The scheduling priorities as defined in the RTM optimization to meet the need for decreasing Supply as reflected from higher to lower priority are as follows:

<b>Scheduling Run Priority</b>	<b><u>Scheduling Parameters Under Soft Energy Bid Cap (27.4.3.2)</u></b>	<b><u>Scheduling Parameters Under Hard Energy Bid Cap (27.4.3.3)</u></b>
Non-Participating Load increase	Not Applicable	Not Applicable
Reliability Must Run (RMR) Schedule (Day-Ahead manual pre-dispatch or Manual RMR Dispatches or Dispatches that are flagged as RMR Dispatches following the MPM, for Legacy RMR Units and Exceptional Dispatch for RMR Resources process)	-\$6000	-\$12000
Transmission Ownership Right (TOR) Self-Schedule	-\$5900	-\$11800
Existing Rights (ETC) Self-Schedule	-\$5100 to -\$5900	-\$10200 to -\$11800
Regulatory Must-Run and Regulatory Must-Take (RMT) Self-Schedule;	-\$1400	-\$2800
Participating Load increase	Not Applicable	Not Applicable
Day-Ahead Supply Schedule	-\$1200	-\$2400
Self-Schedule Hourly Block	-\$1100	-\$2200
Import Self-Schedule of a non-Priority Wheeling Through	\$0	\$0

These dispatch priorities as defined in the RTM optimization may be superseded by operator actions and procedures as necessary to ensure reliable operations.