

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

City of Tacoma, Department of	)	
Public Utilities, Light Division	)	Docket No. EL24-14-000
d/b/a Tacoma Power	)	
v.	)	Docket No. EL24-25-000
	)	
California Independent System	)	[Not Consolidated]
Operator Corporation	)	

**ANSWER OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
CORPORATION TO COMPLAINT**

The California Independent System Operator Corporation (CAISO) submits its answer to the complaints filed in the above-captioned proceedings by the City of Tacoma, Department of Public Utilities, Light Division d/b/a Tacoma Power (Tacoma) on November 13, 2023 and November 21, 2023.<sup>1</sup>

**I. Answer**

Tacoma’s November 13 complaint appeals a tariff-required sanction of \$31,000 related to late corrections of meter data values for each trading day in July 2022. The November 21 complaint appeals \$31,000 in sanctions for late corrections of meter data values for each trading day in August 2022. Both complaints are substantially similar to the complaint Tacoma filed on September 27, 2023 in docket number EL23-103, which seeks relief from \$42,000 in sanctions for late corrections of meter data values for the trading days in the

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<sup>1</sup> The CAISO files this answer pursuant to Rule 213 of the Federal Energy Regulatory Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.213.

period May 20, 2022 to June 30, 2022. Aside from the impacted trading days, the underlying issues in all three complaints are similar.

On October 30, 2023, the CAISO filed an answer in docket number EL23-103 explaining the CAISO supports relief for parties such as Tacoma that have established they are exposed to inequitable penalties under the existing tariff rules.<sup>2</sup> That position applies equally to the complaints in docket numbers EL24-14-000 and EL24-25-000. The CAISO's October 30 filing also requested the Commission consider granting "relief for all trade dates affected by the inaccurate loss factor issue" to "lessen the administrative burden on Tacoma, the Commission, and the CAISO . . . ."<sup>3</sup> The CAISO respectfully reiterates that prior request.

## **II. Communications**

Under Rule 203(b)(3) of the Commission's Rules of Practice and Procedure, the CAISO respectfully requests that service of all pleadings, documents, and all communications regarding this proceeding be addressed to:

David S. Zlotlow  
Lead Counsel  
California Independent System  
Operator Corporation  
250 Outcropping Way  
Folsom, CA 95630  
Tel: (916) 351-4400  
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<sup>2</sup> *City of Tacoma v. Cal. Indep. Sys. Operator Corp.*, Answer to Complaint, at 3, FERC Docket No. EL23-103-000 (Oct. 30, 2023).

<sup>3</sup> *Id.*

### III. Conclusion

Consistent with the position it has taken in response to a prior Tacoma complaint, the CAISO supports Tacoma's request to excuse the meter data sanction at issue in the above-captioned complaints.

**/s/ David S. Zlotlow**

Roger E. Collanton  
General Counsel

Anthony Ivancovich  
Deputy General Counsel

Andrew Ulmer  
Assistant General Counsel

David S. Zlotlow  
Lead Counsel

California Independent System  
Operator Corporation  
250 Outcropping Way  
Folsom, CA 95630

Counsel for the California Independent  
System Operator

Dated: November 30, 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 30<sup>th</sup> day of November, 2023.

*/s/ Ariana Rebancos*

Ariana Rebancos

An employee of the California ISO