

October 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 Docket No. ER25-2603-

Dear Secretary Reese:

The California Independent System Operator Corporation ("CAISO")¹ submits this filing in compliance with the Commission's Order on Request for Waivers, issued September 25, 2025 ("Waiver Order").² In Order No. 676-K,³ the Commission directed public utilities, including the CAISO, to incorporate in their jurisdictional tariffs the latest version (Version 004) 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.

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

Order on Request for Waivers, Docket No. ER25-2603-000 (September 25, 2025), 192 FERC ¶ 61,248 ("Waiver Order").

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

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 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 27, 2026 as to the NAESB cybersecurity standards and August 27, 2026 as to the remaining NAESB Version 004 standards.

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, 2023.⁵ 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 support cybersecurity for the wholesale electric industry, modifications to complement the NERC Reliability Standards, the new NAESB Base Contract for Sale and Purchase

Waiver Order at P 12.

⁵ Order No. 676-K at P 6.

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. 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.

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, 2026.⁸ 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.⁹

CAISO submitted its compliance filing and petition to waive certain of these standards on June 24, 2025. On September 25, 2025, the Commission issued its Waiver Order, granting CAISO's requests for waiver. Specifically, the Commission

⁶ Id.

⁷ *Id.*

⁸ Order No. 676-K at P 45.

⁹ Order No. 676-K at P 47.

granted the CAISO's requests for comprehensive renewed waivers of the standards set forth in WEQ-002, WEQ-003, WEQ-013, and waiver of the provisions of WEQ-001, WEQ-012, and WEQ-023, consistent with prior waivers of these standards. The Commission also granted the CAISO's requests for waiver of the newly-adopted OASIS requirements within the NAESB standards that are specifically identified in the CAISO's transmittal.

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.

II. Proposed Tariff Revisions

Adoption of the Version 004 NAESB standards set forth in Order No. 676-K does not require any changes or revisions to the existing provisions of the CAISO tariff.

Therefore, in accordance with Order No. 676-K, 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-K.

The CAISO also has revised tariff section 7.3.3 to list the Version 004 NAESB standards for which the CAISO has been granted a waiver and citing the Commission's Waiver Order, issued September 25, 2025.

Waiver Order at P 10.

Waiver Order at P 11.

III. 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 as to the NAESB cybersecurity

standards, WEQ Version 004

Attachment B Red-lined document showing the revisions contained in this

compliance filing as to the NAESB cybersecurity standards,

WEQ Version 004

Attachment C Clean CAISO tariff sheets incorporating the compliance

changes described above as to the remaining NAESB

standards, WEQ Version 004

Attachment D Red-lined document showing the revisions contained in this

compliance filing as the remaining NAESB standards, WEQ

Version 004

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IV. 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 and the Waiver Order, effective February 27, 2026 as to the NAESB cybersecurity standards and August 27, 2026 as to the remaining NAESB Version 004 standards.

Respectfully submitted,

/s/ John E. Spomer

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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 24th day of October, 2025.

1s/ Jacqueline Meredith

Jacqueline Meredith
An employee of the California ISO

Attachment A – Clean Tariff Sheets re: NAESB Cybersecurity Standards (Feb 27, 2026) Compliance Filing – NAESB Standards California Independent System Operator Corporation Oct 24, 2025

- 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).

Pursuant to FERC's Order on Requests for Waiver, Docket No. ER25-2603-000 (September 25, 2025), 192 FERC ¶ 61,248, 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);
- - 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) Compliance Filing – NAESB Standards California Independent System Operator Corporation Oct 24, 2025

- 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 Pursuant to FERC's Order on Requests for Waiver, Docket No. ER25-2603-000 (September 25, 2025), 192 FERC ¶ 61,248, 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);
- - 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) Compliance Filing – NAESB Standards California Independent System Operator Corporation Oct 24, 2025

- 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).

Pursuant to FERC's Order on Requests for Waiver, Docket No. ER25-2603-000 (September 25, 2025), 192 FERC ¶ 61,248, the CAISO has been granted 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) Compliance Filing – NAESB Standards California Independent System Operator Corporation Oct 24, 2025

- 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;
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- 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 Pursuant to FERC's Order on Requests for Waiver, Docket No. ER25-2603-000 (September 25, 2025), 192 FERC ¶ 61,248, the CAISO has been granted 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.