

October 7, 2019

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

**Re: California Independent System Operator Corporation,  
Docket No. ER06-615-\_\_\_\_  
Informational Filing per CAISO Tariff Section 39.7.1.3.2  
Request for Privileged Treatment Under 18 C.F.R Section 388.112**

Dear Secretary Bose:

Pursuant to Section 39.7.1.3.2 of its tariff, the California Independent System Operator Corporation (CAISO) submits this informational filing containing the rates or formulas used to calculate negotiated default energy bids, custom operations and maintenance adders, major maintenance adders, and opportunity costs for the month of September, 2019. In these reports, the CAISO includes information on new, modified, or terminated rates and formulas that were implemented in the preceding month. In September 2019, there were eight revised major maintenance adders (Attachment A); and one new opportunity cost adder (Attachment B). There were no new, revised, or terminated negotiated default energy bids or custom operations and maintenance adders in September 2019.

Section 20.2 of the CAISO tariff requires that the CAISO treat individual bids from scheduling coordinators as confidential. Negotiated default energy bids and start-up and minimum load costs, which include custom operations and maintenance adders, and major maintenance adders, are components of bids. Accordingly, pursuant to section 20.2 of the CAISO tariff, the CAISO has labeled the documents included with this filing as confidential. In addition, the documents contain proprietary information regarding specific generating units, such as unit efficiency factors, scaling factors, and operation and maintenance costs. For these reasons, the Commission should accord these attachments privileged treatment pursuant to Section 388.112 of the Commission's regulations.

Please contact the undersigned if you have any questions or concerns regarding the foregoing.

Respectfully submitted,

**By: /s/ Sidney Mannheim**

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System Operator Corporation

**Informational Filing Pursuant to CAISO Tariff Section 39.7.1.3.2**

**October 7, 2019**

**California Independent System Operator Corporation**

**Attachment A**

***Confidential Major Maintenance Adder Information***

**[ATTACHMENT CONSISTS OF PRIVILEGED MATERIAL REDACTED  
PURSUANT TO 18 C.F.R. § 388.112]**

**Informational Filing Pursuant to CAISO Tariff Section 39.7.1.3.2**

**October 7, 2019**

**California Independent System Operator Corporation**

**Attachment B**

***Confidential Custom Operation and Maintenance Adder Information***

**[ATTACHMENT CONSISTS OF PRIVILEGED MATERIAL REDACTED  
PURSUANT TO 18 C.F.R. § 388.112]**

## CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the above-referenced proceeding, 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 7<sup>th</sup> day of October, 2019.

*/s/ Anna Pascuzzo*  
Anna Pascuzzo