

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, DC 20426

OFFICE OF ENERGY MARKET REGULATION

In Reply Refer To
California Independent System
Operator Corporation
Docket No. ER24-2687-000

Issued: September 20, 2024

Heather Curlee
Senior Counsel
California Independent System Operator Corporation
250 Outcropping Way
Folsom, CA 95630

Reference: Deficiency Letter

On August 2, 2024, California Independent System Operator Corporation (CAISO) filed revisions to its Open Access Transmission Tariff (Tariff) as part of its annual business review. CAISO states these revisions “correct typographical errors, realign or remove erroneous cross-references, clarify ambiguity, and ensure consistency of the tariff with the CAISO’s business practice.”¹ Please be advised that this filing is deficient, and that additional information is necessary to process the filing. Please provide the information requested below.

CAISO proposes the following change to section 36.11.2 of its Tariff:

No less than forty-five (45) days prior to the in-service date of a Merchant Transmission Facility, the Project Sponsor of the facility will inform the CAISO of the In-Service Date of the facility and that the Project Sponsor will be requesting Merchant Transmission CRRs associated with the Merchant Transmission Facility. The CAISO will complete the Merchant CRR Allocation as soon as feasible after the In-Service Date of the facility. The effective date of any such allocated Merchant Transmission CRRs is prospective and the

¹ CAISO Transmittal at 1.

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Merchant Transmission CRRs are not settled and will allocate
~~Merchant Transmission CRRs whose payment stream will be~~
retroactive back to the In-Service Date.

In Attachment A - Matrix of Changes, CAISO describes its revision in section 36.11.2 as “Procedural Refinement. Enhancing procedural descriptions of Merchant CRR Allocation Process and to remove language regarding a ‘payment stream.’”² However, in addition to this, the revision appears to alter the Merchant Transmission Congestion Revenue Rights from being “retroactive back to the In-Service Date” to being “prospective and... not settled retroactive back to the In-Service Date.” Please explain this proposed change.

This letter is issued pursuant to 18 C.F.R. § 375.307(a)(1)(v) and is interlocutory. This letter is not subject to rehearing under 18 C.F.R. § 385.713. CAISO must respond within 30 days of the date of this letter by making an amendment filing in accordance with the Commission’s electronic tariff requirements.³

The filing requested in this letter will constitute an amendment to the filing, and a new filing date will be established, pursuant to *Duke Power Company*, 57 FERC ¶ 61,215 (1991), upon receipt of CAISO’s electronic tariff filing. A notice of amendment will be issued upon receipt of the response. Failure to respond to this letter order within the time period specified, and in the manner directed above, may result in a further order rejecting the filing. Until receipt of the amendment filing, a new filing date will not be assigned to this case.

Issued by: Amery S. Poré, Director, Division of Electric Power Regulation – West

² Attachment A – Matrix of Changes at 13.

³ *Electronic Tariff Filings*, 130 FERC ¶ 61,047, at PP 3-8 (2010) (an amendment filing must include at least one tariff record even though a tariff revision might not otherwise be needed). The response must be filed using Type of Filing Code 180 – Deficiency Filing.

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