



September 9, 2024

The Honorable Debbie-Anne Reese  
Acting 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 Sections 30.4.5.4.5 and 39.7.1.3.2  
Request for Privileged Treatment Under 18 C.F.R Section 388.112**

Dear Secretary Bose:

The CAISO submits this informational filing containing the rates or formulas used to calculate negotiated default energy bids, variable operations and maintenance adders, and opportunity costs for the month of August 2024. In these reports, the CAISO includes information on new, revised, or terminated rates and formulas that were implemented in the preceding month. In August 2024, the CAISO revised five (5) variable operation and maintenance adders (Attachment A). There were no new or terminated variable operation and maintenance adders; no new, revised or terminated opportunity cost adders; and no new, revised or terminated negotiated default energy bids in August 2024.

On January 1, 2022, the California Independent System Operator Corporation (CAISO) implemented new tariff rules applicable to variable operations and maintenance adders set forth in CAISO Tariff Section 30.4.5.4.5. The new variable operations and maintenance adders replace the major maintenance adders, and the custom operations and maintenance adders.

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 variable operations and 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/ Sarah E. Kozal**

Roger E. Collanton  
General Counsel  
Sarah E. Kozal  
Counsel  
California Independent System  
Operator Corporation  
250 Outcropping Way  
Folsom, CA 95630  
Tel: (916) 956-8838  
Fax: (916) 608-7222  
[skozal@caiso.com](mailto:skozal@caiso.com)

Attorneys for the California Independent  
System Operator Corporation

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

**September 9, 2024**

**California Independent System Operator Corporation**

**Attachment A**

***Confidential Variable Operations 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 9<sup>th</sup> day of September 2024.

*/s/ Ariana Rebancos*

Ariana Rebancos