

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

**California Independent System            )       Docket No. ER04-835-010  
Operator Corporation                    )**

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

The California Independent System Operator Corporation (CAISO) submits this answer to the comments filed by Shell Energy North America (US), L.P. (Shell Energy) in this proceeding on August 31, 2020, regarding the corrected response the CAISO submitted on August 10, 2020 to a deficiency letter issued by the Commission on May 21, 2020 (Corrected Deficiency Letter Response).<sup>1</sup>

**I.       Answer**

Shell Energy does not contend the Corrected Deficiency Letter Response fails to provide the information the Commission sought in the deficiency letter. Instead, Shell Energy requests that the Commission direct the CAISO to provide Shell Energy with the portions of the invoicing table included in the Corrected Deficiency Letter Response that contain Shell Energy's own corrected information, pursuant to a non-disclosure agreement to be executed by Shell Energy.<sup>2</sup>

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<sup>1</sup>       The CAISO submits this answer pursuant to Rule 213(a)(3) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213(a)(3).

<sup>2</sup>       Shell Energy at 2.

There is no need for the Commission to grant Shell Energy's request. As the CAISO explained in the Corrected Deficiency Letter Response, it will provide each scheduling coordinator with its own corrected interest calculations,<sup>3</sup> which is exactly the same corrected information the CAISO provided (for all scheduling coordinators) to the Commission in the invoicing table. The CAISO had intended to provide the corrected interest calculations to the scheduling coordinators in conjunction with its submission of the Corrected Deficiency Letter Response,<sup>4</sup> but it has not yet done so due to an inadvertent oversight. The CAISO plans to correct the oversight and provide each scheduling coordinator, including Shell Energy, with its own corrected interest calculations by September 30, 2020.

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<sup>3</sup> Corrected Deficiency Letter Response at 1 n.3.

<sup>4</sup> *Id.*

## II. Conclusion

For the foregoing reasons, the Commission should accept the Corrected Deficiency Letter Response consistent with the discussion in this answer.

Respectfully submitted,

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Dated: September 15, 2020

## CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all of the parties listed on the official service list for the above-referenced proceeding, pursuant to the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Washington, DC this 15<sup>th</sup> day of September, 2020.

/s/ Daniel Klein

Daniel Klein

Davis Wright Tremaine LLP