

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

**California Independent System) Docket No. ER14-2484-000
Operator Corporation)**

**REQUEST FOR LEAVE TO FILE INFORMATIONAL REPORT OUT-OF-TIME
AND
INFORMATIONAL REPORT OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

The California Independent System Operator Corporation (“CAISO”) herein provides notice, pursuant to the Commission’s letter order of September 22, 2014,¹ that it has implemented the market power mitigation procedures set forth in Section 39.7 of its tariff to EIM transfer constraints between the PacifiCorp East and PacifiCorp West balancing authority areas and from the CAISO balancing authority area into the PacifiCorp West balancing authority area.

In the September 22 Order, the Commission agreed with the CAISO that it would be appropriate to apply the CAISO’s real-time local market power mitigation procedures to transmission constraints into and between PacifiCorp’s balancing authority areas, in conjunction with PacifiCorp’s participation in the Energy Imbalance Market.² The Commission noted, however, that the CAISO’s proposed changes to Section 29.39(d)(2) of its tariff, which would make the implementation of such mitigation contingent on the Commission accepting a filing by the CAISO specific to each EIM entity, were still pending. The

¹ *Cal. Indep. Sys. Operator Corp.*, 148 FERC ¶ 61,222 (2014) (“September 22 Order”).

² *Id.* at P 13.

Commission stated that if the Commission accepted the CAISO's proposed revisions to Section 29.39(d)(2), the CAISO must include PacifiCorp's EIM transfer constraints in the local market power mitigation procedures and file an informational report within 30 days of doing so.³

The Commission subsequently accepted the CAISO's proposed modifications to Section 29.39(d)(2)⁴ and the CAISO implemented local market power mitigation on PacifiCorp's EIM transfer constraints effective as of the date that PacifiCorp began participating in the Energy Imbalance Market (November 1, 2014). In the process of evaluating and preparing its response to comments on its petition to implement local market power mitigation for the EIM transfer constraints relating to NV Energy, the CAISO realized that it had neglected to file the informational report directed by the Commission in the September 22 Order. The CAISO apologizes for this oversight, and requests that the Commission accept this report out-of-time. The CAISO submits that no entity will be prejudiced or otherwise harmed as a result of this late filing. The CAISO is confident that market participants have been fully aware that the CAISO, consistent with the September 22 Order, has been applying its market power mitigation procedures to intertie constraints into PacifiCorp and between PacifiCorp's balancing authority areas since implementation.⁵

³ *Id.*

⁴ *Cal. Indep. Sys. Operator Corp.*, 149 FERC ¶ 61,058 (2014) at P 81.

⁵ See, e.g., the Energy Imbalance Market Structural Market Power Informational Report, prepared by the CAISO's Department of Market Monitoring ("DMM") and filed in Docket No. ER14-1386-000 on May 29, 2015, in which the DMM analyzed and reported on structural market power issues related to EIM transfer constraints.

For these reasons, the CAISO respectfully requests that the Commission accept the enclosed informational report out-of-time.

Respectfully submitted,

/s/ Michael Kunselman

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Dated: September 11, 2015

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the captioned 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 Washington, D.C., this 11th day of September, 2015.

/s/ Michael Kunselman
Michael Kunselman