

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

California Independent System Operator Corporation)	Docket No. ER13-1470-000
)	
)	
Northern Tier Transmission Group)	
)	
Deseret Generation & Transmission Co-Operative, Inc.)	Docket No. ER13-1457-000
)	
Idaho Power Company)	Docket No. ER13-1467-000
)	
NorthWestern Corporation)	Docket No. ER13-1448-000
)	
PacifiCorp)	Docket No. ER13-1473-000
)	
Portland General Electric Company)	Docket No. ER13-1463-000
)	
WestConnect)	
)	
Arizona Public Service Company)	Docket No. ER13-1450-000
)	
Black Hills Power, Inc.)	Docket No. ER13-1472-000
)	
Black Hills Colorado Electric Utility Company, LP)	Docket No. ER13-1474-000
)	
Cheyenne Light, Fuel & Power Company)	Docket No. ER13-1471-000
)	
El Paso Electric Company)	Docket No. ER13-1465-000
)	
NV Energy)	Docket No. ER13-1466-000
)	
Public Service Company of Colorado)	Docket No. ER13-1469-000
)	
Public Service Company of New Mexico)	Docket No. ER13-1447-000
)	
Tucson Electric Power Company)	Docket No. ER13-1461-000
)	
UNS Electric, Inc.)	Docket No. ER13-1462-000

**ANSWER TO MOTIONS TO INTERVENE AND COMMENTS, AND MOTION
TO FILE ANSWER AND ANSWER TO LIMITED PROTESTS, OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION,
NORTHERN TIER TRANSMISSION GROUP APPLICANTS, AND
WESTCONNECT APPLICANTS**

The California Independent System Operator Corporation (“ISO”),¹ Northern Tier Transmission Group Applicants,² and WestConnect Applicants³ (collectively, “Applicants”) file this answer to the motions to intervene and comments submitted⁴ in the captioned proceedings in response to the Applicants’ May 10, 2013 filing (“May 10 Compliance Filing”) to comply with the interregional requirements of Order No. 1000.⁵

¹ Capitalized terms not otherwise defined herein have the meanings set forth in the proposed tariff changes contained in the compliance filing submitted in these proceedings.

² The Northern Tier Transmission Group Applicants are: Deseret Generation & Transmission Cooperative, Inc.; Idaho Power Company; NorthWestern Corporation; PacifiCorp; and Portland General Electric Company.

³ The WestConnect Applicants are: Arizona Public Service Company; Black Hills Power, Inc.; Black Hills Colorado Electric Utility Company, LP; Cheyenne Light, Fuel & Power Company; El Paso Electric Company; NV Energy; Public Service Company of Colorado; Public Service Company of New Mexico; Tucson Electric Power Company; and UNS Electric, Inc.

⁴ Motions to intervene and comments were submitted by: Avista Corporation; Basin Electric Power Cooperative, Colorado Springs Utilities, Imperial Irrigation District, Los Angeles Department of Water and Power, Platte River Power Authority, Sacramento Municipal Utility District, Salt River Project Agricultural Improvement and Power District, Southwest Transmission Cooperative, Inc., Transmission Agency of Northern California, Tri-State Generation and Transmission Association, Inc., and Western Area Power Administration (collectively, “Non-Public Utilities”); Bonneville Power Administration; California Department of Water Resources State Water Project; California Public Utilities Commission; Cities of Anaheim, Azusa, Banning, Colton, Pasadena and Riverside, California; City of Santa Clara, California and the M-S-R Public Power Agency; E.ON Climate & Renewables North America, LLC; Modesto Irrigation District; Natural Resources Defense Council and the Sustainable FERC Project; Northern California Power Agency; NW Energy Coalition; Pacific Gas and Electric Company; Puget Sound Energy, Inc.; San Diego Gas & Electric Company (“SDG&E”); and Southern California Edison Company (“SoCal Edison”). In addition, SDG&E and SoCal Edison submitted limited protests.

⁵ *Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities*, Order No. 1000, FERC Stats. & Regs. ¶ 31,323 (2011) (“Order No. 1000”), *order on reh’g and clarification*, Order No. 1000-A, 139 FERC ¶ 61,132 (“Order No. 1000-A”), *order on reh’g and clarification*, Order No. 1000-B, 141 FERC ¶ 61,044 (2012) (“Order No. 1000-B”).

The Applicants also submit a motion to file an answer and their answer to the limited protests submitted in these proceedings.⁶

The Applicants explained that the May 10 Compliance Filing was the result of a comprehensive collaborative process, including extensive stakeholder outreach, to develop common tariff language that meets the requirements of Order No. 1000.⁷ The May 10 Compliance Filing described in detail how the common tariff language satisfies the interregional transmission coordination requirements of Order No. 1000 as well as the Order's six interregional cost allocation principles.⁸ Each Applicant also included modifications to its own tariff to incorporate the interregional provisions.⁹

The large majority of stakeholders support or do not oppose the May 10 Compliance Filing. Three entities – SoCal Edison, SDG&E, and Non-Public Utilities – timely submitted comments and limited protests regarding the May 10 Compliance Filing

⁶ The Applicants submit this answer pursuant to Rules 212 and 213 of the Commission's Rules of Practice and Procedure, 18 C.F.R. §§ 385.212, 385.213. The Applicants request waiver of Rule 213(a)(2), 18 C.F.R. § 385.213(a)(2), to permit them to make an answer to the limited protests. Good cause for this waiver exists here because the answer will aid the Commission in understanding the issues in the proceedings, provide additional information to assist the Commission in the decision-making process, and help to ensure a complete and accurate record in the case. *See, e.g., Equitrans, L.P.*, 134 FERC ¶ 61,250, at P 6 (2011); *California Independent System Operator Corp.*, 132 FERC ¶ 61,023, at P 16 (2010); *Xcel Energy Services, Inc.*, 124 FERC ¶ 61,011, at P 20 (2008). The Commission previously permitted answers to protests of the Order No. 1000 regional compliance filings. *See, e.g., Public Service Co. of Colo.*, 142 FERC ¶ 61,206 at P 11 (2013).

⁷ Transmittal letter for May 10 Compliance Filing at 6-18. The Applicants encompass three of the four transmission planning regions in the United States portion of the Western Interconnection. Several members of the fourth transmission planning region, ColumbiaGrid, authorized the Applicants to represent that they participated in the development of, and incorporated in their filings, the common tariff language proposed by the Applicants, barring a Commission order determined to be inconsistent with such incorporation. *Id.* at 2-3 & n.4.

⁸ *Id.* at 18-26.

⁹ *Id.* at 26-32.

on June 24, 2013. A group of public interest organizations submitted an intervention motion on June 24 but later amended that filing on July 3, 2013 with additional parties and comments on the May 10 compliance filing.¹⁰

As explained below, the Commission should accept the May 10 Compliance Filing without modification. Although both SoCal Edison and SDG&E would like to expand the scope of Order No. 1000 by imposing additional interregional planning and cost allocation requirements, neither party has shown that the common tariff language submitted for approval is inconsistent with Order No. 1000. In addition, the Applicants agree that the Non-Public Utilities' interpretation of an interregional transmission project is consistent with the tariff language.

I. Answer

A. Response to SDG&E's and SoCal Edison's Comments and Protests.

1. Scope of Interregional Process.

SDG&E argues that the May 10 Compliance Filing does not sufficiently explain how the transmission planning processes of different regions will be coordinated as required by Order No. 1000. SDG&E states that many of its concerns could be addressed by formally involving the Western Electricity Coordinating Council ("WECC") Transmission Expansion Planning Policy Committee ("TEPPC") and imposing a tariff obligation to form joint interregional transmission planning groups that bear greater duties than are proposed in the May 10 Compliance Filing.¹¹

¹⁰ The Applicants are filing a response to the public interest groups' motion concurrently with this answer.

¹¹ SDG&E at 9-11.

SDG&E further argues that the commitments made in the May 10 Compliance Filing to confer and to seek to resolve differences do not amount to a formal procedure and do not constitute meaningful coordination or joint evaluation. To meet the intent of Order No. 1000, SDG&E recommends that the regions undertake a tariff obligation to form interregional study teams to conduct joint evaluations of proposed interregional transmission projects and to develop and execute a study plan that harmonizes differences in study assumptions and methodologies.¹²

SDG&E's arguments fail to recognize that the Commission decided to require only an interregional coordination process, not an interregional planning process:

We decline to adopt the recommendations of those commenters that suggest that the Commission adopt a more robust, formalized interregional transmission planning process than the interregional transmission coordination requirements in the Proposed Rule, such as an interregional transmission coordination process that complies with the Order No. 890 transmission planning principles or that produces an interregional transmission plan. We clarify here that the interregional transmission coordination requirements that we adopt do not require formation of interregional transmission planning entities or creation of a distinct interregional transmission planning process to produce an interregional transmission plan. Rather, our requirement is for public utility transmission providers to consider whether the local and regional transmission planning processes result in transmission plans that meet local and regional transmission needs more efficiently and cost-effectively, after considering opportunities for collaborating with public utility transmission providers in neighboring transmission planning regions.¹³

As the Commission noted, the interregional process has two characteristics: (1) coordination and evaluation, and (2) data exchange and transparency.¹⁴ These

¹² SDG&E at 11-12.

¹³ Order No. 1000 at P 399.

¹⁴ *Id.* at P 394.

characteristics do not necessitate the involvement of outside organizations, formal planning groups, dispute resolution procedures or study plans. Indeed, the extensive structures that SDG&E would impose on the process would be counterproductive, delaying the resolution of transmission system needs and interfering with the regional planning process. Moreover, the use of WECC TEPPC in the manner suggested by SDG&E would usurp regional methodologies. SDG&E advocated these positions during the development of the May 10 Compliance Filing and they were rejected as exceeding the scope of Order No. 1000 as demonstrated by the quotation set forth above.

SoCal Edison argues that the implementation details, such as project financing, cost overruns, ownership structure, construction, and operational control, should be resolved up front instead of through subsequent negotiations among the relevant regions.¹⁵

SDG&E similarly argues that the May 10 Compliance Filing fails to provide any description of how the regions will formalize agreements on interregional cost allocation for proposed interregional transmission projects that are included in two or more regions' transmission plans. SDG&E cites a number of fact-specific hypothetical scenarios that it believes are not answered by the proposed tariff language. SDG&E states that while it does not believe the tariff language addressing cost allocation and implementation issues needs to include every detail, the tariff language should provide an implementation framework so that stakeholders and the Commission can make reasonable judgments as to the overall workability of the May 10 Compliance Filing.¹⁶

¹⁵ SoCal Edison at 5-6.

¹⁶ SDG&E at 15-16.

The resolution of these issues is not a necessary part of either coordination and evaluation, or data exchange and transparency. Moreover, many of these issues are not even a necessary part of a regional planning process. Project financing is the responsibility of the entity assigned to construct a project; it is not addressed through the planning process. Neither is ownership structure or construction. Order No. 1000 doesn't mandate construction, at all.¹⁷ Operational control will depend on many factors, such as the location of the project, the respective cost shares, and the number and types of interconnections. Furthermore, Order No. 1000 made clear that it addressed cost allocation and expressly declined to address cost recovery.¹⁸ Thus, these variables were not addressed in Order No. 1000 and are too many to be resolved by tariff, and are better suited for individual agreements – as they are in joint projects today. Any agreement concerning cost allocation must necessarily be approved by the Commission – the Federal Power Act requires it. Cost recovery issues – such as cost overrun and disallowance issues – should be addressed when the developing/owning entity files transmission rates to recover its costs from transmission customers for transmission.¹⁹ Such issues are beyond the scope of Order No. 1000 and thus Order No. 1000 does not require the resolution of such issues in an interregional coordination process.

¹⁷ Order No. 1000-A at P 378 (“Order No. 1000 does not address transmission construction.”)

¹⁸ Order No. 1000 at PP 159, 563; Order No. 1000-A at P 616,

¹⁹ Such filings are to be made pursuant to Federal Power Act section 205 – pursuant to which the entity seeking to provide new transmission services will make a filing under Section 205 with a proposed revenue requirement, and resulting rates, and with the legal burden to demonstrate that such rates are just and reasonable, and with the opportunity for interested parties to demonstrate otherwise, and to have its objections adjudicated before the Commission under Section 205, with rights to appeal before the appellate courts.

2. Benefit Calculation and Cost Allocation.

The proposed interregional coordination process provides that each Relevant Planning Region first evaluates whether the interregional project meets a regional need, and, if so, the planning region then identifies the associated regional benefits through the application of its regional cost allocation methodology. Each Relevant Planning Region then calculates its assigned *pro rata* share of the projected interregional project costs, which is equal to its share of the total benefits identified by the Relevant Planning Regions multiplied by the projected costs of the interregional project. After sharing with the other Relevant Planning Regions information regarding what its regional benefit would be if it were to select the interregional project for Interregional Cost Allocation, the Relevant Planning Region may identify its total share of the projected interregional project costs in order to determine whether to select the interregional project in its regional transmission plan for purposes of Interregional Cost Allocation.

SDG&E objects to this “avoided or deferred cost” method. It doubts that the process will provide a proposed interregional transmission project an opportunity to be included in a Relevant Planning Region’s transmission planning process because “regional projects may only be partially displaced by an interregional project proposal, the benefits of ‘deferral’ can be speculative, the allocable costs of an interregional project would be dependent on the determination of benefits by other regions, and . . . the value of avoided or deferred costs is an extremely narrow definition of the benefits an interregional project can provide.” SDG&E does not believe that the process appropriately considers benefits such as reducing congestion related costs, enhancing the

capacity value of generators, or lowering the cost of complying with state renewable portfolio standard requirements.²⁰

SDG&E further argues that the May 10 Compliance Filing fails to account for benefits that are not identified in the individual regional transmission planning processes, but are nevertheless potentially significant and that could be recognized at the interregional level through analysis.²¹ According to SDG&E, while the Commission has provided that no region may be forced to pay costs for an interregional project involuntarily, Order No. 1000 cannot reasonably be read to allow regions to resist cost allocation by refusing to recognize the full range of benefits that might be provided by an interregional project.²²

SoCal Edison argues that the regions must use a uniform methodology to calculate and allocate costs. According to SoCal Edison, without a uniform methodology, regions will not necessarily identify the same benefits and will thus use different benefit measures to determine whether to include an interregional project in their regional plans for the purpose of cost allocation. SoCal Edison states that Order No. 1000 requires such uniformity.²³

These comments fail to take into account the purpose of interregional coordination in Order No. 1000. Order No 1000 does not impose a second level interregional transmission planning process on top of the regional transmission planning

²⁰ SDG&E at 8.

²¹ *Id.* at 13.

²² *Id.* at 13-14.

²³ SoCal Edison at 7, citing Order No. 1000 at P 578..

process, with duplicative assessments of needs and benefits. To do so would be both inefficient and a waste of resources. Rather, as the Commission explained in Order No. 1000-A, the interregional coordination reforms do *not* require the establishment of interregional planning processes to develop integrated interregional plans, but rather call upon public utility transmission providers to consider “whether the local and regional transmission planning processes result *in transmission plans* that meet local and regional transmission needs more efficiently and cost-effectively, after considering opportunities for collaborating with public utility transmission providers in neighboring transmission planning regions.”²⁴ Since the purpose of interregional coordination is thus to determine whether an interregional project might displace one or more projects included in regional or local transmission plans, the cost of the displaced projects represents a reasonable measure of the benefits of the interregional project for cost allocation purposes.

Contrary to SoCal Edison, Order No.1000 does not require that each region determine its *regional* benefits according to the same methodology. Order No. 1000 requires a uniform methodology for allocating costs *among* regions, not for determining benefits within a region, with regard to interregional transmission facilities.²⁵ Indeed, SoCal Edison’s approach would require a region to determine the benefits of an interregional project differently than its determination of benefits from a regional project, which would make it impossible to determine whether the interregional project is a “more

²⁴ Order No. 1000-A at P 511 (emphasis added). See also No. 1000 at P 368, where the Commission explained that it was requiring further reforms in interregional coordination because, in the absence of coordination between regions, transmission providers “may be unable to identify more efficient and cost-effective solutions to the individual needs identified in their respective local and regional transmission planning processes, potentially including interregional transmission facilities.”

²⁵ Order No. 1000 at P 578.

efficient and cost-effective solution[s] to the individual needs identified in their respective local and regional transmission planning processes.”²⁶

Moreover, this process does not fail to consider the benefits that SDG&E cites. The regional transmission process takes all of those benefits into account. The interregional process does not ignore these benefits, but simply evaluates whether the Relevant Planning Regions can achieve them at a lesser cost. Through this approach, the proposed process goes beyond that required by Order No. 1000. The Commission specifically stated that the rule did not require in the interregional process identification of conceptual or contingent elements, the consideration of transmission needs driven by Public Policy Requirements, or the evaluation of economic considerations, with regard to interregional transmission facilities.²⁷

SDG&E’s contention that Order No. 1000 cannot reasonably be read to allow regions to resist cost allocation by refusing to recognize the full range of benefits that might be provided by an interregional project is contrary to the unambiguous provisions of that Order. The Commission has stated that the decision whether to include an interregional project in a regional plan for the purposes of cost allocation is a decision to be made by each region through its regional transmission planning process.²⁸ It did not impose any conditions on a region’s decision to reject such allocation under its respective regional transmission planning process. Whether a region considers all the benefits that SDG&E believes it may have missed is thus irrelevant.

²⁶ Order No. 1000 at P 368.

²⁷ Order No. 1000 at P 401.

²⁸ Order No. 1000 at P 436; see also Order No. 1000 at P 401, Order No. 1000-A at P 635.

Nonetheless, SDG&E's argument suggests that the regions should be directed to undertake a tariff obligation to respond to a project proponent's claim that an interregional transmission project offered more reasonably quantifiable benefits than identified in the regions' evaluations, and that when there is a disagreement as to benefits, a neutral party such as WECC or the TEPPC should perform an independent benefits assessment that the regions would be obligated, at the very least, to publish. SDG&E also recommends that the regions adopt the ISO's Transmission Economic Assessment Methodology, or a suitable alternative, as the basic framework for evaluating the economic benefits of proposed interregional transmission projects.²⁹ One must ask, toward what end? SDG&E's proposal would turn the collaborative process established by the Commission into an adversarial proceeding, imposing significant additional delays and costs. Because the ultimate decision to include the project in a regional plan is a decision to be made by each region under its regional transmission planning process, these delays and costs would serve no purpose. Each region, as required by Order No. 1000, has an open and transparent mechanism for evaluating the benefits of the interregional transmission projects to the region. This process will provide adequate data upon which each region can evaluate the interregional transmission projects.

SoCal Edison also contends that the cost allocation must be binding, and not subject to ongoing negotiations and disputes.³⁰ The Applicants find it unclear to which part of the interregional coordination proposal Edison is directing this argument. There is only one process for allocating costs among regions and it involves no negotiations. To

²⁹ SDG&E at 14-15.

³⁰ SoCal Edison at 4.

the extent that SoCal Edison is proposing that a region must agree to accept the calculated allocation of a proposed interregional project, such a requirement would be contrary to Order No. 1000's explicit statement, noted above, that the decision whether to include an interregional project in a regional plan for the purposes of cost allocation is to be made by each region under its regional transmission planning process.³¹

Finally, SoCal Edison complains that the proposal is unclear as to how other regions will internally assess charges and disburse funds associated with an interregional project among the participating regions.³² The Commission, however, has determined that this is a matter to be determined by each region. .³³

The Applicants have demonstrated in the May 10 Compliance Filing that the cost allocation process complies with the six cost allocation principles in Order No. 1000. Neither SoCal Edison nor SDG&E makes a showing to the contrary. The Commission specifically limited itself to six principles.³⁴ Compliance with those principles suffices.

SoCal Edison does assert that a nonbinding cost allocation principle does not comply with the first principle (that costs be allocated roughly commensurate with benefits), citing an order on compliance regarding regional cost allocation.³⁵ As discussed above, the relevant cost allocation rules in the May 10 Compliance Filing are premised upon the existence of a Commission-approved regional cost allocation method for each region. Each Relevant Planning Region is to first evaluate whether the

³¹ Order No. 1000 at P 436; Order No. 1000-A at P 635.

³² SoCal Edison at 5.

³³ Order 1000 at P 735..

³⁴ Order No. 1000 at PP 603-07.

³⁵ So Cal Edison at 4.

interregional transmission project meets a regional need, and, if so, identify its regional benefits associated with the project through the application of its regional cost allocation methodology. Then, each Relevant Planning Region is to calculate its assigned *pro rata* share of the projected project costs, which is equal to its share of the total benefits identified by the relevant planning regions multiplied by the projected costs of the interregional project. Under the Applicants' May 10 compliance structure for interregional cost allocation, in no instance will the costs of a new interregional facility be allocated among regions without the presence in each such region of an underlying regional cost allocation method that has been found to satisfy the Commission's six cost allocation principles set forth in Order No. 1000. Further, by allocating interregional transmission project costs on a *pro rata* basis among regions based upon the projected benefits in each relevant planning region, the Applicants' interregional cost allocation process ensures that costs are allocated in a manner that is roughly commensurate with estimated benefits in a manner fully compliant with the Commission's first cost allocation principle.

3. Miscellaneous

SoCal Edison recommends that, for reliability projects, at a minimum, the ISO should require interregional transmission project negotiations to be completed at least seven years prior to the date the project is needed. SoCal Edison states that in its experience developing large-scale transmission projects, seven years is the average length of time it takes to complete such a project.³⁶

³⁶ *Id.* at 8-9.

The ISO does not believe there is any reason to impose such a requirement. The Commission did not do so in Order No. 1000, and the ISO has not proposed to do so either. There is no reason to require that a project that can be completed in three years be identified seven years out, just because the average project takes seven years. Planning regions are fully capable of balancing construction times with needs horizons without artificial deadlines.

SDG&E argues that, regardless of whether the Commission decides to act on the recommendations provided by SDG&E in its comments, the Commission should direct the Applicants and the other participating parties to review the effectiveness of whatever interregional transmission planning and cost allocation procedures are observed periodically and determine whether changes are needed.³⁷

There is no need for such a requirement. The Applicants consistently evaluate their respective regional planning processes and certainly will do so as part of the coordinated interregional planning embodied in the common tariff language. An arbitrary structure limiting the Applicants' ability to determine the priority for such review would be counterproductive, and is not required by Order No. 1000.

B. Response to the Non-Public Utilities' Request for Clarification

The Non-Public Utilities submitted comments clarifying a particular provision of the common tariff language. Specifically, these parties note that an interregional project is defined as one that directly interconnects to two or more planning regions *and* is submitted into the planning processes of each region. They note that there may be

³⁷ SDG&E at 8-9.

instances wherein a transmission project developed solely to serve load within their service territories- and not proposed for regional or interregional cost allocation- could interconnect with a facility jointly owned by entities in multiple planning regions. Because section 4.1 of the common tariff language is permissive- “a proponent of an ITP *may* seek to have its ITP jointly evaluated pursuant to Section 4.2”- the Non-Public Utilities seek clarification that a project interconnecting to a facility owned by entities in multiple regions would not be *required* to be evaluated in the regional planning processes.³⁸

The Applicants agree with the Non-Public Utilities’ interpretation of the common tariff language and support these clarifying comments.

II. Conclusion

For the reasons explained above and in the May 10 Compliance Filing, the Commission should accept the May 10 Compliance Filing without modification.

Respectfully submitted,

WESTCONNECT

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³⁸ Non-Public Utilities at 10-12.

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Dated: July 9, 2013

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all of the parties listed on the official service lists for the above-referenced proceedings, 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 9th day of July, 2013.

/s/ Daniel Klein

Daniel Klein
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