

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

California Independent System Operator Corporation | **Docket Nos. ER14-2574-000, -001**

**JOINT MOTION FOR DEFERRAL OF BRIEFING SCHEDULE ON BEHALF
OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION AND THE CITIES OF ANAHEIM, AZUSA, BANNING,
COLTON, PASADENA, AND RIVERSIDE, CALIFORNIA**

In response to the Commission’s Order Initiating Briefing Procedures issued on February 25, 2015 in the above-referenced proceeding,¹ the California Independent System Operator Corporation (“CAISO”) and the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (the “Six Cities”) hereby submit this Joint Motion for deferral of the briefing schedule established by the February 25th Order. As noted below, the CAISO and the Six Cities also request that the Commission establish a shortened time for responses to this motion of March 25, 2015 and issue an order granting this motion by March 26, 2015.

The Commission’s February 25th Order requested additional information relating to the issue raised in the Six Cities’ November 14, 2014 request for rehearing of the “Order on Tariff Revisions” issued by the Commission in this proceeding on October 16, 2014.² The Six Cities requested rehearing of the Commission’s determination in the October 16th Order to approve the Tariff provisions proposed by the CAISO relating to

¹ Order Initiating Briefing Procedures, *Cal. Indep. Sys. Operator Corp.*, 150 FERC ¶ 61,138 (2015) (the “February 25th Order”).

² *Cal. Indep. Sys. Operator Corp.*, 149 FERC ¶ 61,042 (2014) (the “October 16th Order”).

the Flexible Resource Adequacy (“RA”) must-offer obligations applicable to combined Use-Limited Resources. *See* October 16th Order at P 101. The February 25th Order requested additional information with respect to six topics enumerated at P 14.

Following the issuance of the February 25th Order, the CAISO contacted the Cities and proposed a conceptual framework for revision of the Flexible RA must-offer requirements applicable to combined Use-Limited Resources that appears likely to address the concerns raised in the Six Cities’ request for rehearing. The CAISO and the Cities, however, require additional time to discuss the details of the resolution proposed by the CAISO and to develop appropriate Tariff language to implement that resolution. The CAISO and the Six Cities therefore jointly request that the Commission defer the briefing schedule established in the February 25th Order. The CAISO and the Cities anticipate that the CAISO will file revised Tariff language for the Flexible RA must-offer requirements applicable to combined Use-Limited Resources on or before April 10, 2015. The CAISO and the Six Cities request that the Commission allow the Cities and any other interested parties to submit comments on the CAISO’s revised tariff language fifteen days after the CAISO’s filing.

The CAISO and the Six Cities also respectfully request that the Commission establish March 25, 2015 as the due date for responses to this motion and issue an order granting this motion by March 26, 2015. Good cause exists for a shortened response time and expedited action on this Joint Motion in order to avoid unnecessary expenditure of resources by the parties to this proceeding and the Commission and to facilitate a consensual resolution of the issue raised by the Six Cities’ request for rehearing.

CONCLUSION

Wherefore, for the reasons set forth above, the CAISO and the Six Cities respectfully request that the Commission defer the briefing schedule established by the February 25th Order as described above, establish March 25, 2015 as the due date for responses to this Joint Motion, and issue an order granting this Joint Motion on or before March 26, 2015.

Respectfully submitted,

By: /s/ Beth Ann Burns

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March 20, 2015

CERTIFICATE OF SERVICE

I hereby certify that I have on this 20th day of March, 2015, caused a copy of the foregoing document to be sent by electronic mail or United States mail to all parties on the list compiled by the Secretary of the Commission in this proceeding.

/s/ Bonnie S. Blair
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