

May 20, 2014

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Re: California Independent System Operator Corporation
Amendment of Non-Conforming Service Agreement No. 555
Docket No. ER14-1790-000**

Dear Secretary Bose:

On April 28, 2014, the California Independent System Operator Corporation (“CAISO”) submitted for Commission filing and acceptance in this docket Amendment No. 1 to the Second Amended and Restated Silicon Valley Power MSS Agreement (“Amendment”) between the CAISO and the City of Santa Clara, doing business as Silicon Valley Power (“SVP”). The CAISO submitted materials as confidential records in that filing, which are presently designated in the Commission’s records as confidential, but the CAISO neglected to formally request in its transmittal letter that the Commission treat them confidentially. Accordingly, the CAISO hereby supplements the record in this proceeding to include a request that certain records in this proceeding be treated confidentially.

I. Request for Privileged Treatment

Included in a confidential attachment to the Second Amended and Restated Silicon Valley Power MSS Agreement, pursuant to Commission Order Nos. 630 and 630-A,¹ is a copy of the non-public portions of the Second Amended and Restated Silicon Valley Power MSS Agreement. Specifically, all of schedule 1, schedule 11, including the attachments to schedule 11, schedule 14, schedule 14(a), schedule 15.1, and a portion of schedule 17 are designated as confidential. The CAISO is seeking privileged treatment of these materials under 18 C.F.R. § 388.112 as their public disclosure could impair system operations, unnecessarily reveal sensitive information, and pose significant security problems as to the facilities referenced therein. For these reasons, the CAISO

¹ *Critical Energy Infrastructure Information*, Order No. 630, FERC Stats. and Regs. ¶ 31,140, *order on reh’g*, Order No. 630-A, FERC Stats. and Regs. ¶ 31,147 (2003).

submits that these materials should be exempt from public exposure and should be granted privileged treatment. This request is consistent with past treatment of similar information in prior filings,² and for this same information in the SVP filings referenced in the CAISO's transmittal letter.

II. Conclusion

The CAISO respectfully requests that the Commission accept this request as a supplement to the record in this proceeding and continue to designate the requested records as confidential.

Respectfully submitted,
By: /s/ John C. Anders

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² For example, see the CAISO's filing of the Second Amended and Restated City of Riverside Metered Subsystem Agreement among the CAISO and the City of Riverside, which was accepted by Commission letter order issued on February 23, 2012 in Docket No. ER12-740-000.