

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

**Arizona Public Service) Docket No. ER14-2430
Company)**

**LIMITED COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION AND
REQUEST TO ACCEPT FILING ONE DAY OUT-OF-TIME**

The California Independent System Operator Corporation (“CAISO”) provides these comments, one day out-of-time, in response to the answer to the Commission’s September 23, 2014 deficiency letter filed by Arizona Public Service Company (“APS”) on October 24, 2014.¹ The purpose of these comments is to provide further information regarding the control area boundary between APS and the CAISO, as requested in the deficiency letter.

This proceeding involves three five-party unexecuted Non-Conforming Large Generator Interconnection Agreements between NRG Solar Hyder I LLC, NRG Solar Hyder II LLC, and NRG Solar Hyder III LLC (collectively “NRG”), APS, the CAISO, Imperial Irrigation District (“IID”), and San Diego Gas & Electric Corporation (“SDG&E”) (“Hyder LGIAs”). APS filed² the three five-party Hyder LGIAs unexecuted because of a disagreement among NRG, SDG&E and the CAISO regarding a provision that requires the Hyder projects to enter and be studied in the CAISO’s interconnection queue in order for the agreements to be

¹ The Commission established November 14, 2014 as the comment date on APS’s answer to the deficiency letter.

² APS originally filed the three Hyder LGIAs on July 14, 2014. Due to an error with the effective date indicated on the cover pages, APS re-filed the LGIAs on July 31, 2014.

effective as to the CAISO and SDG&E. The CAISO and SDG&E insisted on the inclusion of this provision because the point of interconnection for all three Hyder projects is a transmission facility, the Hassayampa Line, that is within the CAISO balancing authority area and for which the CAISO exercises operational control of SDG&E's majority ownership interest.

On September 23, 2014, the Commission issued a deficiency letter requesting that APS provide further information regarding the Hyder LGIAs. In Question 1, the Commission requested a one-line diagram of the Hassayampa Line and nearby transmission facilities, both "clearly illustrating the CAISO and APS Balancing Authority boundaries." As Exhibit B to its response, APS provided several diagrams showing the location of the Hassayampa Line, the nearby transmission facilities, and the proposed Hyder projects. However, that Exhibit does not explicitly delineate the metered boundary between the CAISO and APS Balancing Authority Areas. Therefore, the CAISO submits, as Attachment A to these comments, a diagram that displays the metered boundary between the CAISO and APS Balancing Authority Areas in the area of the Hassayampa Line.

The CAISO requests that the Commission accept this filing and consider Attachment A as part of any decision that it might ultimately render on the Hyder LGIAs.³ Good cause exists for the Commission to accept this filing one day out-

³ On November 5, 2014, NRG filed in this docket a letter indicating that it has ceased development of the Hyder projects and has requested that APS withdraw the Hyder LGIAs. APS has not yet requested withdrawal of the Hyder LGIAs, and therefore, the CAISO is submitting these comments out of an abundance of caution to be considered in the event that this proceeding is not terminated.

of-time, as due to the limited nature of the CAISO's comments, no party will be prejudiced by a one day delay.

Respectfully submitted,

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Dated: November 17, 2014

Attachment A

CAISO Balancing
Authority Area

Imperial Valley
500 kV

HooDoo Wash
500 kV

Hassayampa
500 kV

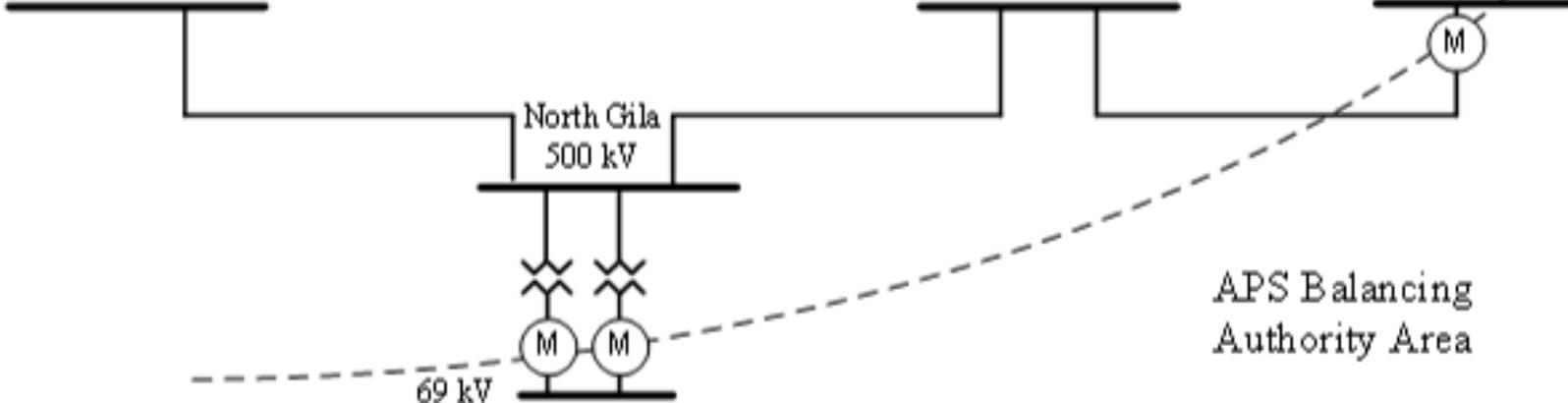
North Gila
500 kV

M

APS Balancing
Authority Area

69 kV

M M



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 17th day of November, 2014.

/s/ Michael Kunselman
Michael Kunselman