

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

California Independent System) Docket No. ER14-2581-000
Operator Corporation)

MOTION TO WITHDRAW FILING

The California Independent System Operator Corporation (“CAISO”) respectfully submits this motion to withdraw the filing it submitted in this docket on August 4, 2014, pursuant to Section 206 of the Federal Power Act, to comply with Commission Order No. 792 (“Order No. 792 compliance filing”).¹ All of the proposed tariff revisions and supporting explanations contained in this filing are also contained in the more comprehensive tariff amendment filing that the CAISO submitted that same day to enhance the CAISO’s generator interconnection process and satisfy the requirements of Order No. 792 (“FPA 205 tariff amendment”).² Therefore, separate consideration by the Commission of the Order No. 792 compliance filing is duplicative and unnecessary.

I. Background

In Order No. 792-A, the Commission directed each public utility transmission provider to submit a compliance filing pursuant to section 206 of the FPA that includes the *pro forma* tariff revisions contained in Order No. 792

¹ The CAISO files this motion pursuant to Sections 35.17(a) and 385.212 of the Commission’s regulations, 18 C.F.R. §§ 35.17(a), 385.212.

² The FPA 205 tariff amendment filing was assigned Docket No. ER14-2586.

without variation.³ The Commission also stated that, in cases where provisions in a public utility transmission provider's existing SGIP and SGIA have previously been found by the Commission to be "consistent with or superior to" the *pro forma* SGIP and SGIA, the public utility transmission provider could demonstrate that the previously approved provisions are consistent with or superior to the *pro forma* SGIP and SGIA as modified in Order No. 792.⁴

During the past year, the CAISO has been engaged in a stakeholder process aimed at developing further improvements to its interconnection procedures, including those that particularly affect small generators, such as the fast track and independent study processes. Because Order No. 792 involved many of the same issues being considered in the CAISO's stakeholder process, the CAISO concluded that it would be most efficient to comprehensively address all of the Order No. 792 directives in its planned tariff amendment on fast track and independent study provisions, *i.e.*, the FPA 205 tariff amendment filed in Docket No. ER14-2856. However, based on the Commission's directive in Order 792-A cited above, the CAISO, on the same date that it filed the FPA 205 tariff amendment, submitted the Order No. 792 compliance filing. The Order No. 792 compliance filing contains only the *pro forma* language from Order No. 792 that the CAISO proposes to adopt without modification.

³ *Small Generator Interconnection Agreements and Procedures*, Order No. 792, 145 FERC ¶ 61,159 (2013) ("Order No. 792"), *order clarifying compliance procedures*, Order No. 792-A 146 FERC ¶ 61,214 (2014) at P 2 ("Order No. 792-A").

⁴ Order No. 792 at P 270.

The CAISO requested that the Commission accept the tariff revisions contained in each filing effective as of November 4, 2014. No entity filed comments or a protest of either CAISO filing. The Commission has not yet issued an order addressing either filing.

II. Request to Withdraw the Order No. 792 Tariff Filing

The CAISO submits this motion to withdraw the Order No. 792 compliance filing currently pending before the Commission.⁵ Separate consideration by the Commission of the Order No. 792 compliance filing is superfluous because all of the proposed tariff revisions and supporting documentation contained in that filing are also contained in the more comprehensive FPA 205 tariff amendment filing. The Commission's order on the FPA 205 tariff amendment filing will, therefore, necessarily assess and rule on the CAISO's compliance with all of the directives of Order No. 792. As a result, further Commission review of the Order No. 792 compliance filing is unnecessary from a compliance perspective, and would be administratively inefficient and provide no benefit to the CAISO or its participants.

Because no entity filed comments or a protest of the Order No. 792 tariff filing, the CAISO does not anticipate that any entity will file an answer in opposition to this motion to withdraw.

⁵ It is not entirely clear whether the standard for withdrawal of the Order No. 792 compliance filing is established by 18 C.F.R. § 35.17(a)(2), which applies to "rate schedule, tariff or service agreement filings," or 18 C.F.R. 385.216, which involves withdrawals of other pleadings. Although filed pursuant to Section 206 rather than Section 205 of the Federal Power Act, the Order No. 792 compliance filing is arguably still a "tariff filing." Regardless, this is a distinction without a difference here because the requirements are identical for filings, such as the Order No. 792 compliance filing, that have not yet become effective and upon which no Commission order has been issued. In both cases, the withdrawal is considered effective if, within 15 days, no opposition is filed and no order denying the withdrawal is issued.

III. Conclusion

For the foregoing reasons, the CAISO submits this motion to withdraw the Order No. 792 tariff filing.

Respectfully submitted,

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Dated: October 29, 2014

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all of the parties listed on the official service list for the above-referenced 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 29th day of October, 2014.

/s/ Bradley R. Miliauskas
Bradley R. Miliauskas