



No. ER12-84-000, and on December 14, 2011, the Commission issued an order accepting the Transition Agreement without change.<sup>2</sup> On September 12, 2012, Valley Electric and the ISO entered into an amendment to the Transition Agreement, which was filed with FERC on September 13, 2012, in Docket ER12-2623-000. The amendment to the Transition Agreement further defines the upgrades under construction on Valley Electric's high voltage system that will be turned over to ISO operational control on the transition date. The amendment also describes certain planned upgrades on Valley Electric's low voltage transmission system, which will also be turned over to ISO operational control when they are complete. The amendment was accepted by Commission letter order dated October 15, 2012.

In June 2012, Valley Electric submitted its completed application to become a participating transmission owner with the ISO in accordance with Article 4 of the Transition Agreement, Section 2.2 of the Transmission Control Agreement, and the Section 4.3 of the ISO tariff. On September 13, 2012, the ISO Board of Governors accepted Valley Electric's application to become a participating transmission owner. The proposed Transmission Control Agreement changes to include Valley Electric as a

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<sup>2</sup> *Cal. Indep. Sys. Operator Corp.*, 137 FERC ¶ 61,194 (2012)

participating transmission owner were filed with the Commission on October 10, 2012, and are pending in Docket No. ER13-71-000.

## **II. Comments**

The ISO supports the addition of Valley Electric as a new participating transmission owner in accordance with the Transition Agreement, the Transmission Control Agreement, and the ISO tariff. The ISO has worked with Valley Electric, interested stakeholders, third parties, state and governmental interests, and others to implement the provisions of these ISO agreements with Valley Electric. Accordingly, the ISO supports the Commission's consideration of the filings made by Valley Electric in this proceeding consistent with these agreements and the ISO tariff.

## **III. Description of the ISO and Communications**

The ISO is a non-profit public benefit corporation organized under the laws of the State of California with its principal place of business at 250 Outcropping Way, Folsom, CA 95630. The ISO is the balancing authority responsible for the reliable operation of the electric grid comprising the transmission systems of a number of utilities, including SCE, and administers the generator interconnection procedures applicable to those facilities. The ISO requests that all communications and notices concerning this motion and these proceedings be provided to:

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#### IV. Conclusion

The ISO requests that the Commission grant the ISO's motion to intervene and accept these comments.

Respectfully submitted  
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Attorneys for the California Independent  
System Operator Corporation

Dated: October 30, 2012

## 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 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 Folsom, California this 30<sup>th</sup> day of October 2012.

*Is/ Anna Pascuzzo*

Anna Pascuzzo