

160 FERC ¶ 61,106  
FEDERAL ENERGY REGULATORY COMMISSION  
WASHINGTON, D.C. 20426

September 21, 2017

In Reply Refer To:  
California Independent System  
Operator Corporation  
Docket No. ER17-2179-000

California Independent System  
Operator Corporation  
250 Outcropping Way  
Folsom, CA 95630

Attn: Anthony Ivancovich  
Deputy General Counsel

Dear Mr. Ivancovich:

1. On July 28, 2017, the California Independent System Operator Corporation (CAISO) filed revisions to its tariff to eliminate the requirement to develop a conceptual statewide plan as part of its annual regional transmission planning process. Specifically, CAISO proposes to eliminate tariff section 24.4.4 in its entirety and remove references to the conceptual statewide plan in tariff sections 24.2, 24.3, 24.4.1(a) and 24.4.5.<sup>1</sup> As discussed below, we accept CAISO's tariff revisions, subject to CAISO submitting a compliance filing to correct what it represents was an inadvertent oversight,<sup>2</sup> effective September 27, 2017, as requested.

2. CAISO explains that in 2009, the California Transmission Planning Group (CTPG) formed to provide a forum for transmission planners and load-serving entities in California to coordinate and conduct joint transmission planning to meet California's infrastructure and policy needs. In 2010, the Commission accepted CAISO's proposal to use an annual

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<sup>1</sup> CAISO Transmittal at 8.

<sup>2</sup> CAISO Answer at 1-2.

conceptual statewide plan, such as one developed by the CTPG, as an input into CAISO's regional transmission planning process.<sup>3</sup>

3. However, CAISO states that following the issuance of Order No. 1000,<sup>4</sup> transmission providers in California focused on implementing that rule's regional transmission planning and interregional transmission coordination requirements. CAISO explains that, in conjunction with its neighboring transmission planning regions, ColumbiaGrid, WestConnect, and Northern Tier Transmission Group, it developed, adopted, and filed joint tariff language implementing formal interregional transmission coordination procedures under Order No. 1000.<sup>5</sup> CAISO states that the Western transmission planning regions' procedures under Order No. 1000 provide more formal, robust, and legally-binding interregional transmission coordination, which has supplanted CAISO's coordination with the CTPG and joint development of a conceptual statewide plan.<sup>6</sup> CAISO also notes that these Order No. 1000-related developments have diminished CTPG member engagement in developing the conceptual statewide plan to such an extent that the CTPG is no longer functioning as a planning entity or coordination body.<sup>7</sup> CAISO asserts that under these circumstances, there is little, if any, value in CAISO alone continuing to develop the conceptual statewide plan, which it argues also detracts CAISO from focusing its limited resources on other regional and interregional transmission planning and coordination activities. CAISO states that its transmission planning processes will not be adversely affected by the tariff revisions, and notes that none of its stakeholders opposed this proposal.<sup>8</sup> Therefore, CAISO requests that the Commission accept its proposed revisions to eliminate the requirement for CAISO to develop a statewide conceptual plan in its annual transmission planning process, effective September 27, 2017.

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<sup>3</sup> *Cal. Indep. Sys. Operator Corp.*, 133 FERC ¶ 61,224, at PP 42-43 (2010).

<sup>4</sup> *Transmission Planning and Cost Allocation by Transmission Owning and Operating Public Utilities*, Order No. 1000, FERC Stats. & Regs. ¶ 31,323 (2011), *order on reh'g*, Order No. 1000-A, 139 FERC ¶ 61,132, *order on reh'g and clarification*, Order No. 1000-B, 141 FERC ¶ 61,044 (2012), *aff'd sub nom, S.C. Pub. Serv. Auth. v. FERC*, 762 F. 3d 41 (D.C. Cir. 2014).

<sup>5</sup> *Pub. Serv. Co. of N.M.*, 149 FERC ¶ 61,247 (2014), *order on compliance*, 151 FERC ¶ 61,189 (2015).

<sup>6</sup> CAISO Transmittal at 5-6.

<sup>7</sup> *Id.* n.18.

<sup>8</sup> *Id.* at 8.

4. Notice of CAISO's filing was published in the *Federal Register*, 82 Fed. Reg. 36,389 (2017), with interventions or protests due on or before August 18, 2017. Timely motions to intervene were filed by the Northern California Power Agency; Modesto Irrigation District; and the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California. Pacific Gas and Electric Company filed a timely motion to intervene and comments supporting CAISO's filing. The City of Santa Clara, California, doing business as Silicon Valley Power (SVP), filed a timely motion to intervene and limited comments, noting that CAISO appears to have inadvertently retained a reference to section 24.4.4 in section 24.13. On August 25, 2017, CAISO filed an answer acknowledging that it inadvertently retained a reference to tariff section 24.4.4 in section 24.13 of its tariff, agreeing with SVP's proposed deletion, and requesting that the Commission direct it to make a compliance filing to correct the error.

5. Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214 (2017), the timely, unopposed motions to intervene serve to make the entities that filed them parties to this proceeding. Rule 213(a)(2) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.213(a)(2) (2017), prohibits an answer to a protest unless otherwise ordered by the decisional authority. We will accept CAISO's answer because it has provided information that assisted us in our decision-making process.

6. We find that CAISO's proposal to eliminate the requirement in its tariff to develop a conceptual statewide plan as part of its annual regional transmission planning process appears to be just and reasonable and has not been shown to be unjust, unreasonable, unduly discriminatory or preferential, or otherwise unlawful. We agree with CAISO that the implementation of Order No. 1000's regional transmission planning and interregional transmission coordination requirements have supplanted the benefits of developing a conceptual statewide plan, and that the tariff provisions to develop a conceptual statewide plan are now redundant and therefore unnecessary. Moreover, we find that eliminating the requirement to develop a conceptual statewide plan will not adversely affect CAISO's current regional transmission planning process or its participation in interregional transmission coordination efforts with neighboring transmission planning regions. The transmission planning and coordination activities required by Order No. 1000, which are set forth in CAISO's tariff, ensure that CAISO's transmission planning process involves extensive and meaningful interregional transmission coordination with other entities and transmission planning regions. Therefore, we accept the tariff revisions, effective September 27, 2017, as requested, subject to CAISO submitting a compliance filing to

remove the erroneous reference to section 24.4.4 in section 24.13 of its tariff, as discussed herein.

By direction of the Commission.

Nathaniel J. Davis, Sr.,  
Deputy Secretary.