

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

|  |   |                        |
|--|---|------------------------|
| The Nevada Hydro Company, Inc.                     | ) |                        |
|  | ) |                        |
| v.   | ) | Docket No. EL19-81-000 |
|  | ) |                        |
| California Independent System Operator Corporation | ) |                        |
|  | ) |                        |

**MOTION OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION FOR AN EXTENSION OF TIME TO ANSWER COMPLAINT**

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. § 385.212, the California Independent System Operator Corporation (“CAISO”) hereby requests that the Commission grant it an extension of time, until July 22, 2019, to consider and respond to the Complaint filed in the above-referenced proceeding on June 17, 2019 by The Nevada Hydro Company, Inc. (“TNHC”). The CAISO is authorized to state that TNHC does not oppose the extension requested by the CAISO.

The CAISO also requests that the Commission require any responses to this motion by June 26, 2019, and issue an order granting the motion no later than June 28, 2019.

**I. BACKGROUND**

The Complaint states that the CAISO failed to follow its Tariff and otherwise failed to perform an open, transparent, comparable, and not unduly discriminatory study of the Lake Elsinore Advanced Pumped Storage hydroelectric project (“LEAPS”),

as a transmission facility in the CAISO's 2018-1019 transmission planning process. The Complaint requests the Commission (1) direct the CAISO to correct alleged modeling errors and produce new results using data already in its possession, (2) find that doing so would lead to a determination that LEAPS is a more economic and cost effective solution for identified reliability needs, (3) find that LEAPS exceeds the benefits necessary for selection as an economic transmission solution, and (4) direct the CAISO to include LEAPS in the CAISO's transmission plan as a fully approved project.

## **II. EXTENSION OF TIME**

TNHC filed the Complaint on June 17, 2019. The Commission issued a Notice of Complaint on June 18, 2019, setting July 8, 2019 as the date for parties to file answers to the Complaint. The CAISO has reviewed the Complaint and requests additional time – until July 22, 2019 -- to properly assess and respond to the Complaint given the nature, scope, and extent of the filing, the volume of documentation, and the schedules of the CAISO personnel with knowledge and expertise regarding the subject matter of the Complaint.

The Complaint is extensive, raising a multitude of allegations that the CAISO must address. The Complaint also contains hundreds of pages of exhibits, including a 74 page affidavit. Finally, CAISO personnel who are needed to review and assess the Complaint, address the numerous allegations, and participate in developing a response have prior commitments that make them unavailable or limit their availability, further necessitating an extension request. A modest two-week extension allows the CAISO to properly consider and respond to the Complaint.

Granting an extension will enhance the record that is available to the Commission

when it rules on the Complaint, which constitutes good cause to grant this motion. See *Complaint Procedures*, Order No. 602-A, FERC Stats. & Regs. ¶ 31,076 at 30,856 (1999) (clarifying that the Commission will “be flexible” in considering extensions of the time to answer complaints and will “favor” extensions that foster the development of the record early in the complaint process); see *also* 18 C.F.R. § 385.2008 (authorizing extensions of time “for good cause”). The additional time will allow for a more thorough and complete answer for the Commissioner to consider in making its ruling.

### III. CONCLUSION

For the foregoing reasons, the CAISO respectfully requests that the Commission expeditiously grant this motion for an extension and grant the CAISO until July 22, 2019 to respond to the Complaint.

Respectfully submitted,

**By: /s/ Anthony J. Ivancovich**

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June 20, 2019

## **CERTIFICATE OF SERVICE**

I certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceedings, 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 20th day of June, 2019.

/s/ Martha Sedgley  
Martha Sedgley