

April 2, 2019

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: California Independent System Operator Corporation

**Filing of Corrected Effective Date for Dynamic Transfer
Balancing Authority Operating Agreement with Gridforce
Energy Management, LLC, Request for Waiver of Notice
Requirement, and Request for Expedited Comment Period**

Docket No. ER19-1420-001

Dear Secretary Bose:

The California Independent System Operator Corporation (“CAISO”) submits this filing to correct the effective date of the Dynamic Transfer Balancing Authority Operating Agreement (“Dynamic Transfer Agreement”) between the CAISO and Gridforce Energy Management, LLC (“Gridforce”), which the CAISO filed in this proceeding on March 22, 2019 with a requested effective date of May 22, 2019 (“March 22 Filing”). The corrected effective date, which does not require any revisions to the text of the Dynamic Transfer Agreement, is April 12, 2019.

The CAISO respectfully requests waiver of the Commission’s 60-day notice requirement to permit this effective date. The CAISO also requests that the Commission make any comments on this filing due by April 12, 2019, which is the same date any comments on the March 22 Filing are due, and that the Commission issue an order accepting the Dynamic Transfer Agreement as soon as practicable after the April 12 comment due date.

I. Corrected Effective Date of the Dynamic Transfer Agreement

On March 22, 2019, the CAISO filed the Dynamic Transfer Agreement in this proceeding to allow the provision of both dynamic schedule and pseudo-tie arrangements between the CAISO and Gridforce balancing authority areas.¹ The CAISO requested that the Commission accept the Dynamic Transfer Agreement effective on May 22, 2019, *i.e.*, 61 days after the March 22 Filing was submitted.

The Commission issued a notice of filing that made any comments on the March 22 Filing due by April 12, 2019.² To date, no comments (or other pleadings) have been submitted in response to the March 22 Filing.

After the March 22 Filing was submitted, Gridforce raised a question with the CAISO about the requested May 22 effective date. The CAISO and Gridforce subsequently determined that the requested effective date of the Dynamic Transfer Agreement needed to be corrected to April 12, 2019.

The CAISO submits the instant filing to make the Dynamic Transfer Agreement effective on April 12 instead of the originally requested May 22 effective date. Section 1.1 of the Dynamic Transfer Agreement (entitled “Effective Date”) does not list a specific effective date but rather states that the agreement will become effective upon Commission acceptance. Therefore, no changes to the text of the Dynamic Transfer Agreement are needed to make it effective on April 12, and the CAISO and Gridforce have made no such changes. The only change being made by this filing is the change in effective date, which affects only the metadata associated with the tariff record for the Dynamic Transfer Agreement and none of the content of that agreement.³

II. Request for Waiver of Notice Requirement

Pursuant to Section 35.11 of the Commission’s regulations,⁴ the CAISO respectfully requests waiver of the 60-day notice requirement set forth in Section 35.3(a)(1) of the Commission’s regulations,⁵ to permit the Dynamic Transfer Agreement to become effective on April 12, 2019. The CAISO and Gridforce

¹ The CAISO designated the Dynamic Transfer Agreement as CAISO Rate Schedule No. 4956.

² Combined Notice of Filings #1, Docket Nos. ER18-1709-001, *et al.*, at 4-5 (Mar. 22, 2019).

³ For this reason, the CAISO is not including an attachment to this filing that shows the text of the Dynamic Transfer Agreement, only the tariff record itself.

⁴ 18 C.F.R. § 35.11.

⁵ 18 C.F.R. § 35.3(a)(1).

have agreed to this effective date for their Dynamic Transfer Agreement, and no entity will be adversely impacted by the April 12 effective date. Therefore, good cause exists to make the Dynamic Transfer Agreement effective on the date requested in this filing.

III. Request for Expedited Comment Period

The CAISO respectfully requests that the Commission establish a due date of April 12, 2019 for comments on the instant filing. Although the CAISO is requesting an expedited comment period for this filing, if granted it will make any comments due on the same date that comments are already due on the March 22 Filing (upon which no entity has yet commented). As explained above, the instant filing does not include any proposed changes to the text of the Dynamic Transfer Agreement, only to the effective date reflected in the metadata associated with the agreement's tariff record. Therefore, granting an April 12 due date for comments on the instant filing will impose no additional burden on any entity that chooses to comment on the March 22 Filing.

The CAISO does not request an expedited Commission order in this proceeding by a specified date. Nonetheless, the CAISO believes it is unlikely that any entity will submit comments that are adverse to the March 22 Filing or to the instant filing. Further, as the CAISO explained in the March 22 Filing, the Dynamic Transfer Agreement is consistent with requirements in the CAISO tariff and is very similar to the Dynamic Transfer Balancing Authority Operating Agreement between the CAISO and the Western Area Power Administration – Desert Southwest Region previously accepted by the Commission.⁶ For these reasons, and assuming no adverse comments are filed, the CAISO respectfully requests that the Commission issue an order accepting the Dynamic Transfer Agreement between the CAISO and Gridforce as soon as practicable after the requested April 12 due date for comments.

IV. Service

The CAISO has served copies of this filing upon the same entities that it served with the March 22 Filing, namely Gridforce, the California Public Utilities Commission, the California Energy Commission, Arizona Public Service Company, Public Service Company of New Mexico, and any party designated on the Commission's official service list.⁷ In addition, the CAISO has posted this filing on the CAISO website.

⁶ See transmittal letter for March 22 Filing at 1-2.

⁷ See *id.* at 3; and 18 C.F.R § 385.2010.

V. Conclusion

The CAISO respectfully requests that the Commission accept the Dynamic Transfer Agreement between the CAISO and Gridforce effective April 12, 2019 and make any comments on this filing due by that same date.

Respectfully submitted,

By: /s/ John C. Anders

Roger E. Collanton
General Counsel
Burton A. Gross
Deputy General Counsel
John C. Anders
Assistant General Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630
Tel: (916) 608-7278
Fax: (916) 608-7222
Email: janders@caiso.com

Attorneys for the California Independent
System Operator Corporation

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 2nd day of April, 2019.

/s/ Grace Clark
Grace Clark