

July 2, 2015

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

### REDACTED VERSION FOR PUBLIC RELEASE

### PRIVILEGED INFORMATION CONTAINED IN CONFIDENTIAL ATTACHMENT

Re: California Independent System Operator Corporation Filing of Non-Conforming Service Agreement No. 798 Docket No. ER15-\_\_\_\_-000

Dear Secretary Bose:

The California Independent System Operator Corporation ("CAISO") submits for Commission filing and acceptance an Amendment No. 2 to the Second Amended and Restated City of Riverside MSS Agreement ("Amendment") between the CAISO and the City of Riverside. The purpose of this amendment is to add a new solar resource to the MSS Agreement and to update metering and contact information. The CAISO requests an effective date of September 1, 2015.

### I. Background

The CAISO filed the original MSS Agreement ("MSSA") between the CAISO and City of Riverside on May 18, 2007 in Docket No. ER07-923-000. By letter order issued July 11, 2007, the Commission accepted it as Original Service Agreement No. 798 under the currently effective CAISO Tariff.<sup>2</sup> As described in the CAISO's

The CAISO submits the Amendment pursuant to Section 205 of the Federal Power Act, 16 U.S.C. § 824d (2012).

<sup>&</sup>lt;sup>2</sup> The effective CAISO Tariff at the time of the Commission's original acceptance of the MSS Agreement was designated as CAISO FERC Electric Tariff, First Replacement Volume Nos. I and

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filing in that proceeding, the MSSA provides for treatment of the City of Riverside as an MSS Operator in relation to the terms of the CAISO Tariff. The CAISO filed an amended and restated MSSA between the CAISO and City of Riverside on October 31, 2008 in Docket No. ER09-188-000 to be effective upon implementation of the CAISO's new market, which was accepted by letter order of the Commission issued on January 23, 2009. Subsequently the parties twice amended this MSSA. See Letter Order dated July 19, 2010 in Docket No. ER10-1289-000; Letter Order dated October 25, 2010 in Docket No. ER10-2525-000. On December 30, 2011 the CAISO submitted a second amended and restated MSSA in Docket ER12-740-000 which the Commission accepted by letter order issued on February 23, 2012. Subsequently the parties amended this MSSA through a filing dated May 16, 2014 in Docket No. ER14-1974-000, which the Commission accepted by letter order issued on June 26, 2014.

# II. Purpose of the Amendment to the Second Amended and Restated City of Riverside MSSA

The purpose of the Amendment is to incorporate a new renewable generating resource into Riverside's MSS system – Tequesquite Landfill Solar Project, by amending Schedule 1: Riverside's System Facilities, Schedule 14, Generating Units and Market –Participating Loads, and to update Schedule 15.1: Metering Information, and Schedule 17: Contacts for Notices.

### III. Effective Date and Request for Waiver

The CAISO requests that the Amendment included in the instant filing be made effective as of September 1, 2015, which is the date that the new generating resource is planned to commence Commercial Operation.

### IV. Request for Privileged Treatment

Included in a confidential attachment to this letter and pursuant to Commission Order Nos. 630 and 630-A,<sup>3</sup> is a copy of the non-public portions of the schedules being amended designated as confidential, including all of Schedules 14 and 15.1, and those portions of Schedule 17 including sensitive contact information. The CAISO is seeking privileged treatment of these materials under 18 C.F.R. § 388.112 as their public disclosure could impair system operations, unnecessarily reveal sensitive information, and pose significant security problems as to the facilities referenced therein. For these reasons, the CAISO submits that these materials should be exempt from public

II. The currently effective CAISO Tariff is designated as CAISO Fifth Replacement FERC Electric Tariff.

<sup>&</sup>lt;sup>3</sup> Critical Energy Infrastructure Information, Order No. 630, FERC Stats. and Regs. ¶ 31,140, order on reh'g, Order No. 630-A, FERC Stats. and Regs. ¶ 31,147 (2003).

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exposure and should be granted privileged treatment. This request is consistent with past treatment of this information in prior filings. Specifically, the Commission accepted the most recent versions of these schedules as confidential in response to the CAISO's December 30 2011 filing of the Second Amended and Restated City of Riverside Metered Subsystem Agreement, which the Commission accepted by letter order issued on February 23, 2012 in docket no. ER12-740-000.

### V. Expenses

No expense or cost associated with this filing has been alleged or judged in any judicial or administrative proceeding to be illegal, duplicative, unnecessary, or demonstratively the product of discriminatory employment practices.

### VI. Service

Copies of this filing have been served upon City of Riverside, the California Public Utilities Commission, and all parties on the official service list for Docket No. ER14-1974-000. In addition, the filing has been posted on the CAISO Website.

Enclosed for filing is each of the following:

- (1) this letter of transmittal;
- (2) The public version of Amendment No. 2 to the Second Amended and Restated City of Riverside MSSA (Attachment A):
- (3) Clean version of the public version of the affected MSSA schedules as amended (Attachment B):
- (4) Red-lined version of the public version of the affected MSSA schedules as amended (Attachment C);
- (5) The confidential version of Amendment No. 2 (Attachment D);
- (6) Clean version of the confidential version of the affected MSSA schedules as amended (Attachment E); and
- (7) Red-lined version of the confidential version of the affected MSSA schedules as amended (Attachment F).

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### VI. Correspondence

The CAISO requests that all correspondence, pleadings, and other communications concerning this filing be served upon the following:

John C. Anders\*
Lead Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630

Tel: (916) 608-7287 Fax: (916) 608-7222

E-mail: janders@caiso.com

\* Individual designated for service pursuant to Rule 203(b)(3), 18 C.F.R. § 203(b)(3).

### VI. Conclusion

The CAISO respectfully requests that the Commission accept this filing and permit the CAISO's submittal of the Amendment to be effective as of the date requested. If there are any questions concerning this filing, please contact the undersigned.

Respectfully submitted,

By: /s/ John C. Anders

Roger Collanton
General Counsel
Sidney L. Mannheim
Assistant General Counsel
John C. Anders
Lead Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630

Tel: (916) 608-7287 Fax: (916) 608-7222 janders@caiso.com

Attorneys for the California Independent System Operator Corporation



### CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION

### AND

### **CITY OF RIVERSIDE**

# Amendment No. 2 to the Second Amended and Restated City of Riverside MSS Agreement

**THIS AMENDMENT NO. 2** is dated this \_\_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_, 2015 and is entered into, by and between:

(1) The City of Riverside, a municipal corporation of the State of California, which owns and operates a municipal electric utility system engaged in the Generation, transmission, distribution, purchase and sale of electric power and Energy at wholesale and retail, having its registered and principal place of business located at 3900 Main Street, Riverside, California 92522 ("Riverside");

and

(2) California Independent System Operator Corporation, a California non-profit public benefit corporation having its principal place of business located in such place in the State of California as the CAISO Governing Board may from time to time designate, 250 Outcropping Way, Folsom, California 95630 (the "CAISO").

Riverside, and the CAISO are hereinafter referred to individually as "Party" or collectively as the "Parties."

### Whereas:

- A. The Parties are signatories to the Amendment No. 1 to the Second Amended and Restated Riverside MSS Agreement, which was effective April 21, 2014, and the Second Amended and Restated Riverside MSS Agreement, which was effective January 1, 2012, (the "MSSA"). The Second Amended and Restated MSSA replaced the original MSSA effective July 1, 2007, and the First Amended and Restated MSSA which was effective March 31, 2009.
- B. The Parties desire to amend the MSSA ("Amendment No. 2") to incorporate a new renewable generation project to Riverside's distribution system Tequesquite Landfill Solar Project, by amending Schedule 1: Riverside's System Facilities, Schedule 14, Generating Units and Market –Participating Loads, and



- Schedule 15.1: Metering Information. The Parties also agree to update Schedule 17: Contacts for Notices.
- **C.** In all other respects, the Parties intend that the MSSA remain in full force and effect in accordance with its terms.

### NOW THEREFORE, THE PARTIES AGREE as follows:

- **1. Effective Date.** This Amendment No. 2 shall be effective on the date made effective by FERC.
- **2. Termination.** The provisions of this Amendment No. 2 shall remain in full force and effect, unless subsequently amended, until the termination of the Second Amended and Restated MSSA.
- **3.** Amendment to the Agreement. The Second Amended and Restated MSSA shall be amended as follows:
  - 3.1 Schedule 1 Riverside's System Facilities is deleted in its entirety and the Schedule 1 attached to this Amendment No. 2 is substituted in its place.
  - **3.2** Schedule 14 Generating Units and Market Participating Loads is deleted in its entirety and the Schedule 14 attached to this Amendment No. 2 is substituted in its place.
  - 3.3 Schedule 15.1 Metering Information is deleted in its entirety and the Schedule 15.1 attached to this Amendment No. 2 is substituted in its place.
  - 3.4 Schedule 17 Contacts for Notices is deleted in its entirety and the Schedule 17 attached to this Amendment No. 2 is substituted in its place.



**IN WITNESS WHEREOF**, the Parties have caused this Amendment No. 2 to be duly executed by and through their respective authorized representatives as of the date hereinabove written.

### **CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Title:	DocuSigned by:  Eric Schmitt  VP, Operations  6/24/2015
<b>CITY (</b> By:	OF RIVERSIDE
Name:John A. Russo	
Title:	City Manager
D-4	



**!N W!TNESS WHEREOF**, the Parties have caused this Amendment No. 2 to be duly executed by and through their respective authorized representatives as of the date hereinabove written.

## 

APPHOVED AS TO FORM

DEPUTY CITY ATTORNEY

# SCHEDULE 1 - RIVERSIDE'S SYSTEM FACILITIES [Section 1.2]

The following facilities form Riverside's System, including the Points of MSS Interconnection, except as noted in B) Point of Delivery, Load and Generation.

### For Riverside:

- A) Point of MSS Interconnection: Not applicable at the present time.
- B) Point of Delivery: Vista Substation 220\_kV bus

The interface between the City of Riverside and the CAISO Controlled Grid is at the Vista Substation 220\_kV bus, which is the Point of Delivery for transactions in the CAISO wholesale market.

The Vista Substation 220\_kV bus is not part of Riverside's System.

C) Point of Delivery: Mira Loma Substation 220 kV bus

The interface between the Clearwater Power Plant and the CAISO Controlled Grid is at the Mira Loma Substation 220 kV bus, which is the Point of Delivery for transactions in the CAISO wholesale market.

The Mira Loma Substation 220 kV bus is not part of Riverside's System.

- D) Riverside Load
- E) Generation Facilities

Spring Units 1, 2, 3, & 4

Riverside Energy Resource Center ("RERC") Units 1, 2, 3, & 4

Clearwater Power Plant CT Unit 1 & ST Unit 2

Tequesquite Landfill Solar Project



# SCHEDULE 14 - GENERATING UNITS AND MARKET-PARTICIPATING LOADS [Sections 10.1 and 10.5]



### Schedule 14



### **SCHEDULE 15.1 – METER INFORMATION**





### **SCHEDULE 17 - CONTACTS FOR NOTICES**

### [Sections 3.3.3 and 19.1]

Riverside

Name of Primary

Representative: Girish Balachandran

Title: Public Utilities General Manager
Address: 3750 University Avenue, 3rd Floor

City/State/Zip Code: Riverside, CA 92501

Email Address: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Phone: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Fax No: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Name of Alternative

Representative: Reiko Kerr

Title: Utilities Assistant General Manager - Resources

Address: 3435 14th Street

City/State/Zip Code: Riverside, CA 92501

Email Address: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Phone: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Fax No: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

### **Authorized Representative (Section 3.3.3):**

Representative: Girish Balachandran

Title: Public Utilities General Manager
Address: 3750 University Avenue, 3rd Floor

City/State/Zip Code: Riverside, CA 92501

Email Address: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Phone: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Fax No: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]



### **CAISO**

Name of Primary

Representative: Regulatory Contracts

Title: N/A

Address: 250 Outcropping Way

City/State/Zip Code: Folsom, CA 95630

Email Address: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Phone: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Fax No: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Name of Alternative

Representative: Christopher J. Sibley

Title: Manager, Regulatory Contracts

Address: 250 Outcropping Way

City/State/Zip Code: Folsom, CA 95630

Email Address: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Phone: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Fax No: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

### **Authorized Representative (Section 3.3.3):**

Representative: Eric Schmitt

Title: Vice President, Operations

Address: 250 Outcropping Way

City/State/Zip Code: Folsom, CA 95630

Email Address: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

# Attachment B– Public clean schedules as amended

### SCHEDULE 1 - RIVERSIDE'S SYSTEM FACILITIES

[Section 1.2]

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The interface between the Clearwater Power Plant and the CAISO Controlled Grid is at the Mira Loma Substation 220\_kV bus, which is the Point of Delivery for transactions in the CAISO wholesale market.

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Clearwater Power Plant CT Unit 1 & ST Unit 2

Tequesquite Landfill Solar Project

### SCHEDULE 14 - GENERATING UNITS AND MARKET-PARTICIPATING LOADS

[Section 10.1 and 10.5]

### **SCHEDULE 15.1 – METER INFORMATION**

The text of this Schedule has been redacted from the public tariff version pursuant to a request for privileged treatment under 18 C.F.R. § 388.112.

### **SCHEDULE 17 - CONTACTS FOR NOTICES**

### [Sections 3.3.3 and 19.1]

Riverside

Name of Primary

Representative: Girish Balachandran

Title: Public Utilities General Manager
Address: 3750 University Avenue, 3rd Floor

City/State/Zip Code: Riverside, CA 92501

Email Address: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Phone: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Fax No: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Name of Alternative

Representative: Reiko Kerr

Title: Utilities Assistant General Manager - Resources

Address: 3435 14th Street

City/State/Zip Code: Riverside, CA 92501

Email Address: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Phone: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Fax No: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

### Authorized Representative (Section 3.3.3):

Representative: Girish Balachandran

Title: Public Utilities General Manager
Address: 3750 University Avenue, 3rd Floor

City/State/Zip Code: Riverside, CA 92501

Email Address: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Phone: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Fax No: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

### **CAISO**

Name of Primary

Representative: Regulatory Contracts

Title: N/A

Address: 250 Outcropping Way

City/State/Zip Code: Folsom, CA 95630

Email Address: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Phone: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Fax No: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Name of Alternative

Representative: Christopher J. Sibley

Title: Manager, Regulatory Contracts

Address: 250 Outcropping Way

City/State/Zip Code: Folsom, CA 95630

Email Address: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Phone: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Fax No: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

### **Authorized Representative (Section 3.3.3):**

Representative: Eric Schmitt

Title: Vice President, Operations

Address: 250 Outcropping Way

City/State/Zip Code: Folsom, CA 95630

Email Address: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

# Attachment C- Public marked schedules as amended

### SCHEDULE 1 - RIVERSIDE'S SYSTEM FACILITIES

[Section 1.2]

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### SCHEDULE 14 - GENERATING UNITS AND MARKET-PARTICIPATING LOADS

[Section 10.1 and 10.5]

### **SCHEDULE 15.1 – METER INFORMATION**

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### **SCHEDULE 17 - CONTACTS FOR NOTICES**

### [Sections 3.3.3 and 19.1]

Riverside

Name of Primary

Representative: <u>Girish Balachandran David Wright</u>
Title: Public Utilities General Manager

Address: 3901 Orange Street 3750 University Avenue, 3rd Floor

City/State/Zip Code: Riverside, CA 92501

Email Address: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Phone: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Fax No: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Name of Alternative

Representative: Reiko KerrGary Nolff

Title: Utilities Assistant General Manager - Resources

Address: <u>3435 14th Street</u>3901 Orange Street

City/State/Zip Code: Riverside, CA 92501

Email Address: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Phone: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Fax No: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

### Authorized Representative (Section 3.3.3):

Representative: <u>Girish Balachandran David Wright</u>
Title: Public Utilities General Manager

Address: <u>3750 University Avenue, 3rd Floor</u>3901 Orange Street

City/State/Zip Code: Riverside, CA 92501

Email Address: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Phone: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Fax No: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

### **CAISO**

Name of Primary

Representative: Regulatory Contracts Roni L. Reese

Title: N/ASenior Contracts Analyst

Address: 250 Outcropping Way

City/State/Zip Code: Folsom, CA 95630

Email Address: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Phone: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Fax No: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Name of Alternative

Representative: Christopher J. Sibley

Title: <u>Manager, Regulatory ContractsLead Contract Negotiator</u>

Address: 250 Outcropping Way

City/State/Zip Code: Folsom, CA 95630

Email Address: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Phone: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

Fax No: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]

### **Authorized Representative (Section 3.3.3):**

Representative: Eric Schmitt

Title: Vice President, Operations

Address: 250 Outcropping Way

City/State/Zip Code: Folsom, CA 95630

Email Address: [Privileged Material Redacted Pursuant to 18 C.F.R § 388.112]