

California Independent System Operator Corporation

May 20, 2014

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

Re: California Independent System Operator Corporation Amendment of Non-Conforming Service Agreement No. 457 Docket No. ER14-1789-000

Dear Secretary Bose:

On April 28, 2014, the California Independent System Operator Corporation ("CAISO") submitted for Commission filing and acceptance in this docket a partially-executed Amendment No. 1 to the Third Amended and Restated NCPA MSS Aggregator Agreement ("Amendment") among the CAISO, Northern California Power Agency ("NCPA"), and NCPA's metered subsystem members. The CAISO submitted materials as confidential records in that filing, which are presently designated in the Commission's records as confidential, but the CAISO neglected to formally request in its transmittal letter that the Commission treat them confidentially. Accordingly, the CAISO hereby supplements the record in this proceeding to include a request that certain records in this proceeding be treated confidentially.

I. Request for Privileged Treatment

Included in a confidential attachment to the Third Amended and Restated NCPA MSS Aggregator Agreement, pursuant to Commission Order Nos. 630 and 630-A,¹ is a copy of the non-public portions of the Third Amended and Restated NCPA MSS Aggregator Agreement. Specifically, all of schedule 1, schedule 11, including the attachments to schedule 11, schedule 14, schedule 14(a), schedule 15.1, and a portion of schedule 17 are designated as confidential. 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

¹ 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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problems as to the facilities referenced therein. For these reasons, the CAISO submits that these materials should be exempt from public exposure and should be granted privileged treatment. This request is consistent with past treatment of similar information in prior filings,² and for this same information in the NCPA filings referenced in the CAISO's transmittal letter.

II. Conclusion

The CAISO respectfully requests that the Commission accept this request as a supplement to the record in this proceeding and continue to designate the requested records as confidential.

> Respectfully submitted, **By:** /s/ John C. Anders Roger E. Collanton General Counsel Sidney M. Davies 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

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² For example, see the CAISO's filing of the Second Amended and Restated City of Riverside Metered Subsystem Agreement among the CAISO and the City of Riverside, which was accepted by Commission letter order issued on February 23, 2012 in Docket No. ER12-740-000.