UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

Southern California Edison)	Docket No. ER14-2432-001
Company)	

COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION IN SUPPORT OF AMENDED INTERCONNECTION AGREEMENT

The California Independent System Operator Corporation ("CAISO") files these comments in support of Southern California Edison Company's ("SCE") September 10, 2014 filing of an amended Large Generator Interconnection Agreement ("LGIA") among SP Antelope DSR LLC ("Antelope"), SCE, and the CAISO.¹

On July 15, 2014, pursuant to a request by Antelope, SCE filed an unexecuted LGIA which the CAISO supported with the exception of one provision included by SCE in Appendix C regarding SCE's ability to conduct "technical assessments reasonably related to the interconnection or operation" of the Antelope project. In its comments on that filing, the CAISO explained why it did not believe this "technical assessment" provision was just and reasonable. Subsequent to the CAISO's filing, the CAISO and SCE discussed the CAISO's objections and SCE's rationale for including the proposed language. The conversations resulted in the development of an alternative provision that

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The CAISO submits this motion to intervene and comments pursuant to Rules 212 and 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. §§ 385.212, 214. After the Commission issues an order on SCE's filing, the ISO will submit a certificate of concurrence that accords with the Commission's directives regarding the LGIA.

addresses the CAISO's concerns and is acceptable to the CAISO, SCE and Antelope.

As SCE explains in the September 10 filing, the amended LGIA reflects the resolution of the technical assessment dispute between the CAISO and SCE as well as revisions to the affected systems language included in Appendix C, Section 6 of the LGIA to bring the terms up to the CAISO's current language. The CAISO fully supports both of these revisions, and requests that the Commission approve the amended LGIA as filed.

Respectfully submitted,

Roger E. Collanton
General Counsel
Sidney M. Davies
Assistant General Counsel
California Independent
System Operator Corporation
250 Outcropping Way
Folsom, CA 95630

Michael Kunselman Bradley R. Miliauskas Alston & Bird LLP The Atlantic Building 950 F Street, NW Washington, DC 20004

Attorneys for the California Independent System Operator Corporation

Dated: October 1, 2014

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceeding, 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 Washington, D.C., this 1st day of October, 2014.

<u>/s/ Michael Kunselman</u> Michael Kunselman