

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, DC 20426

In Reply Refer To:
California Independent System
Operator Corporation
Docket Nos. ER12-2207-000
ER12-2209-000
Southern California Edison
Company
Docket Nos. ER12-2206-000
ER12-2208-000
August 10, 2012

California Independent System Operator Corporation
Attention: Baldassaro Di Capo, Esquire
Senior Counsel
250 Outcropping Way
Folsom, CA 95630

Southern California Edison Company
Attention: James A. Cuillier, Director
FERC Rates & Regulation
Post Office Box 800
2244 Walnut Grove Avenue
Rosemead, CA 91770

Gentlemen:

On July 5, 2012, California Independent System Operator Corporation (CAISO) and Southern California Edison Company (SoCal Edison) each separately submitted for filing with the Commission in Docket Nos. ER12-2206-000 through ER12-2209-000, two unexecuted Small Generator Interconnection Agreements (SGIAs) to interconnect two proposed solar generating facilities and transmit the energy to the CAISO-controlled grid.¹ The SGIAs specify the terms and conditions pursuant to which (a) SoCal Edison

¹ The two solar generating facilities are to be located in Lancaster, California. These facilities would interconnect to SoCal Edison's existing Antelope 66kV Substation in the East Kern Wind Resource Area. An SGIA for the Western Antelope Dry Ranch LLC, a 10 megawatt solar generating facility, was filed in Docket Nos. ER12-2206-000 and ER12-2207-000, by SoCal Edison and the CAISO, respectively, and designated as
(continued...)

and CAISO will provide interconnection service, (b) SoCal Edison will design, procure, construct, own, operate and maintain the Participating Transmission Owner's (Participating TO's) interconnection facilities, and (c) interconnection customer will pay for the Participating TO's interconnection facilities. CAISO and SoCal Edison request that the SGIAs become effective July 6, 2012, one day after the filing date.

According to CAISO and SoCal Edison, Silverado Power² informed them that it disputes certain provisions found in the SGIAs. Among the items under dispute are protective relays and telecommunication equipment at Antelope Substation which Silverado Power believes should be classified as network upgrades. However, CAISO and SoCal Edison have stated that the protective relays and telecommunications equipment do not fit the definition of network upgrades and are clearly interconnection facilities installed solely for the protection of Silverado Power's generation tie-line for each project.

Additional information is needed for the Commission to process these filings. Accordingly, CAISO and SoCal Edison are directed to file a response to this letter and provide to the Commission the information requested below:

1. Regarding the SGIA, Attachment 2, Section 1(a)(iv) and (v):
 - a. Provide a detailed schematic showing the proposed location of the fiber optic cables and associated protection equipment relative to the point of interconnection for each of the project's facilities (identified in Attachment 3 of each SGIA).
 - b. Provide a protection system diagram showing the fiber optic cables and associated protection equipment as part of the entire protection system and coordination scheme as designed by SoCal Edison/CAISO for each project, and/or any other purpose.

Service Agreement No. 124 under the SoCal Edison Transmission Owner Tariff, and Service Agreement No. 2566 under the CAISO Tariff. Similarly, an SGIA for the Western Antelope Blue Sky Ranch A LLC, a 20 megawatt solar generating facility, was filed in Docket Nos. ER12-2208-000 and ER12-2209-000, by SoCal Edison and the CAISO, respectively, and designated as Service Agreement No. 125 under the SoCal Edison Transmission Owner Tariff, and Service Agreement No. 2567 under the CAISO Tariff.

² Silverado Power is the managing member of the Martifer-Silverado Fund 1 LLC, which wholly owns the two solar projects.

- c. Identify the protection facilities, if any, including telecommunication facilities, cables, and relays that will be located beyond the point of interconnection.
 - d. Describe the function of this equipment as a part of the protection system and coordination scheme designed by the SoCal Edison/CAISO for Silverado, and/or any other purpose.
 - e. Identify if the use of the proposed facilities, described under Attachment 2, Section 1(a)(iv) and (v), is for, or could be used for, any purpose other than the protection of the Antelope-Western Antelope Dry Ranch 66 kV transmission line.
 - f. Describe if any element of the facilities identified under item 1.e. will be a part of or be activated by any Special Protection Scheme (SPS), Remedial Action Scheme (RAS), and/or Operating Procedure designed or owned by SoCal Edison or CAISO. If any of the facilities are part of any SPS, RAS and/or Operating Procedure, identify the scheme and describe its designed function, including the role of the facilities identified under item 1.e.
2. Regarding the SGIA, Attachment 2, Section 1(a)(xvi):
 - a. Provide a detailed schematic showing the location of the relays relative to the point of interconnection (identified in Attachment 3 of the SGIA).
 - b. Identify the potential use and operation of the relays. Describe if the relays will be a part of or be activated by any Special Protection Scheme (SPS) or Remedial Action Scheme (RAS), and/or Operating Procedure designed by SoCal Edison or CAISO. If they are a part of any SPS, RAS and/or Operating Procedure, identify the scheme and describe its designed function, including the role of these relays.
3. Regarding the SGIA, Attachment 2, Sections 1(b)(i)(3), 1(b)(i)(4) and 1(b)(iii):
 - a. Provide a detailed schematic showing location of the relays and telecommunication equipment relative to the point of interconnection (identified in Attachment 3 of the SGIA).
 - b. Identify the designed function of the relays and telecommunication equipment. Describe if the relays and/or telecommunication equipment will be a part of or be activated by any Special Protection Scheme (SPS), Remedial Action Scheme (RAS), and/or Operating Procedure designed by SoCal Edison or CAISO. If they are a part of any SPS, RAS and/or

Operating Procedure, identify the scheme and describe its designed function, including the role of these facilities.

4. Provide the SoCal Edison Interconnection Handbook mentioned in the SGIA, Attachment 2, Section 1(a)(xvii).
5. Provide the SoCal Edison documents developed under the NERC Standard FAC-001-0, R2.1.5 relating to the system protection and coordination.

The information requested in this letter will constitute an amendment to CAISO's and SoCal Edison's filings. A notice of the amendment will be issued upon receipt of the response.

This letter is issued pursuant to the authority delegated to the Director, Division of Electric Power Regulation – West, under 18 C.F.R. § 375.307 and is interlocutory. This letter is not subject to rehearing pursuant to 18 C.F.R. 385.713. CAISO and SoCal Edison must file a response(s) within 30 days of the date of this letter.

Failure to respond to this order within the time period specified may result in a further order rejecting the filing. Pending receipt of the above information, a filing date will not be assigned to the submittal.

Sincerely,

Steve Rodgers, Director
Division of Electric Power
Regulation - West