

December 6, 2018

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

**Re: California Independent System Operator Corporation
Docket No. ER19-_____-000**

**Notice of Cancellation of EIM Implementation Agreement with
Arizona Public Service Company**

Dear Secretary Bose:

The California Independent System Operator Corporation (CAISO) submits for Commission acceptance this notice of cancellation of the Energy Imbalance Market (EIM) Implementation Agreement between the CAISO and Arizona Public Service Company (APS) (Implementation Agreement).¹ The CAISO is cancelling the Implementation Agreement in accordance with its terms, because the tariff revisions and service agreements needed to implement APS participation in the EIM have gone into effect.

The CAISO requests that the Commission accept this notice of cancellation effective 61 days after the date of this filing, *i.e.*, February 5, 2019.

I. Background and Basis for Cancellation

In 2015, the Commission accepted for filing the CAISO's submittal of the Implementation Agreement and granted the CAISO's requested effective date of August 1, 2015.²

Section 1(d) of the Implementation Agreement states that the agreement shall terminate upon the earliest of any of several specified events that include "the date

¹ The CAISO submits this filing pursuant to Section 35.15 of the Commission's regulations, 18 C.F.R. § 35.15. The Implementation Agreement is designated as CAISO Rate Schedule No. 79.

² *Cal. Indep. Sys. Operator Corp.*, 152 FERC ¶ 61,090 (2015) (Letter Order).

FERC permits all necessary revisions to APS tariff to take effect and the service agreements under such tariff and the ISO tariff necessary for the commencement of the EIM have taken effect.” The events described in the quoted provision of the Implementation Agreement have occurred.³

For these reasons, the Implementation Agreement is no longer needed and has terminated. Therefore, the CAISO requests that the Commission accept this notice of cancellation effective 61 days after the date of this filing, *i.e.*, February 5, 2019.

II. Communications

In accordance with Rule 203(b)(3) of the Commission’s Rules of Practice and Procedure,⁴ and requests that all communications and correspondence regarding this filing should be addressed to the following:

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Operator Corporation
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III. Service

The CAISO has served this filing on APS and all parties on the official service list for the proceeding in which the Commission initially accepted the Implementation Agreement for filing, Docket No. ER15-1802-000.

³ The CAISO has confirmed with APS that termination is appropriate.

⁴ 18 C.F.R. § 385.203(b)(3).

IV. Conclusion

For the reasons stated above, the CAISO requests that the Commission accept this notice of cancellation of the Implementation Agreement as requested.

Respectfully submitted,

By: /s/ John C. Anders

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