

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**California Independent System Operator Corporation**      **Docket Nos. ER11-2318-000**  
**ER11-2368-000**  
**ER11-2369-000**

**Southern California Edison Company**      **Docket Nos. ER11-2204-000**  
**ER11-2316-000**  
**ER11-2177-000**  
**ER11-2411-000**  
**ER11-2322-000**  
**EL11-10-000**

**CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION’S  
REQUEST TO SUBMIT ANSWER AND OPPOSITION TO MOTIONS TO  
CONSOLIDATE**

The California Independent System Operator Corporation (“ISO”) requests leave to submit this answer to individual motions to consolidate, which have been filed in the above-captioned dockets by the following entities: Sacramento Municipal Utility District (“SMUD”), Transmission Agency of Northern California (“TANC”), California Municipal Utilities Association (“CMUA”), Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, CA (“Six Cities”).<sup>1</sup> Docket EL11-10-000 is Southern California Edison’s (SCE) Petition for Declaratory Order for Transmission Incentives (“Incentives Petition”) for certain transmission projects that relate to certain network upgrades needed to interconnect renewable generation, and the other dockets relate to certain non-conforming Large Generator Interconnection Agreements (“LGIAs”) entered into by the ISO, SCE and certain Interconnection Customers. The ISO is concerned that the LGIAs relate to certain projects which have been identified by the State of California for

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<sup>1</sup> The ISO is sometimes referred to as the CAISO.

expedited treatment for purposes of satisfying California's Reliability Portfolio Standard (RPS) requirements and to secure federal stimulus funding under the American Recovery and Reinvestment Act of 2009, commonly known as "ARRA," and that consolidation of the LGIAs together and with SCE's Incentives Petition may delay such projects and frustrate the state goal of expediting these projects.

While the Commission's rules<sup>2</sup> prohibit an answer to protests unless otherwise ordered by decisional authority, the Commission should permit the ISO to file this response because it will aid the Commission in its decision making process on the issue of consolidation of the dockets.<sup>3</sup>

The LGIA dockets relate to the following projects

For the Granite Mountain LGIA, the ISO filed December 14 as Docket No ER11-2369, and SCE filed November 23 as Docket No. ER11.2177;

For the Mojave Solar 1 Project, the ISO filed December 14 as Docket ER11-2368, and SCE filed November 30 as Docket No ER11-2204;

For the Blythe Solar Project LGIA (Palo Verde LGIA), the ISO filed Dec 09 as Docket No ER11-2318; and SCE filed Dec 08 as Docket No 11-2316;

For the Coram Brodie Wind (Coram Energy) LGIA, the ISO filed December 16 as Docket No ER11-2386, and SCE filed December 9 as Docket No. ER11-2322;

For the AV Solar Ranch LGIA, the ISO filed on December 29 as Docket ER11-2572 and SCE filed December 20 as Docket No ER11-2411;

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<sup>2</sup> Rule 213, 18 C.F.R. § 385.213(a)(2).

<sup>3</sup> See, e.g., *Southwest Power Pool, Inc.*, 119 FERC ¶ 61,199, at P 18 (2007) (accepting answers to answers because they provide information that assisted the Commission in its decision-making process); *The New Power Co. v. PJM Interconnection, Inc.*, 98 FERC ¶ 61,208, at p. 61,756 (2002).

For the Palen LGIA, the ISO filed December 21 as Docket No. ER11-2451; and SCE filed December 21 as Docket ER11-2455.

## **RESPONSE**

The ISO and SCE have each individually filed the non-conforming LGIAs because of the requirements of eTariff. Each project which is the subject of the LGIAs is a generating facility interconnecting to the SCE-owned transmission system. In general, the circumstances, in-service dates and costs for interconnection of each project are fact-specific to each project.

The Commission will not consolidate if consolidation would not serve a useful purpose or would cause unnecessary delay. *United Gas Pipe Line Co.*, 34 FERC ¶ 61,282 (1986). Further, the Commission has found that even though there may be elements that may be similar they must be examined independently, consolidation is not appropriate. *Cimarron River Pipeline LLC and Northern Natural Gas Co.*, 124 FERC ¶61,069 (2010).

The projects each involve fact specific circumstances, and interconnection configurations. Most importantly, the projects were identified in 2010 by the State of California for permit streamlining and expedited treatment in order to secure ARRA funding for California and to advance California's 33% RPS standard. The ISO is concerned that consolidation will cause attendant delays to project timelines which could frustrate the goals for which these projects have been expedited.

## CONCLUSION

For the reasons referenced above, the ISO requests that the Commission deny the motions to consolidate the dockets of the non-conforming LGIAs with each other and with SCE's Incentives Petition.

Respectfully submitted,

**By: /s/ Baldassaro "Bill" Di Capo**

Nancy Saracino

General Counsel

Sidney M. Davies

Assistant General Counsel

Baldassaro "Bill" Di Capo

Senior Counsel

California Independent System

Operator Corporation

151 Blue Ravine Road

Folsom, CA 95630

[bdicapo@caiso.com](mailto:bdicapo@caiso.com)

Counsel for the California Independent  
System Operator Corporation

Dated: January 5, 2011

## 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 Folsom, California this 5<sup>th</sup> day of January, 2011

*Anna Pascuzzo*

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