

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

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|---|---|---------------------------------|
| California Independent System Operator Corporation |) | Docket No. ER13-1470-000 |
| |) | |
| Northern Tier Transmission Group |) | |
| |) | |
| Deseret Generation & Transmission Co-Operative, Inc. |) | Docket No. ER13-1457-000 |
| |) | |
| Idaho Power Company |) | Docket No. ER13-1467-000 |
| |) | |
| NorthWestern Corporation |) | Docket No. ER13-1448-000 |
| |) | |
| PacifiCorp |) | Docket No. ER13-1473-000 |
| |) | |
| Portland General Electric Company |) | Docket No. ER13-1463-000 |
| |) | |
| WestConnect |) | |
| |) | |
| Arizona Public Service Company |) | Docket No. ER13-1450-000 |
| |) | |
| Black Hills Power, Inc. |) | Docket No. ER13-1472-000 |
| |) | |
| Black Hills Colorado Electric Utility Company, LP |) | Docket No. ER13-1474-000 |
| |) | |
| Cheyenne Light, Fuel & Power Company |) | Docket No. ER13-1471-000 |
| |) | |
| El Paso Electric Company |) | Docket No. ER13-1465-000 |
| |) | |
| NV Energy |) | Docket No. ER13-1466-000 |
| |) | |
| Public Service Company of Colorado |) | Docket No. ER13-1469-000 |
| |) | |
| Public Service Company of New Mexico |) | Docket No. ER13-1447-000 |
| |) | |
| Tucson Electric Power Company |) | Docket No. ER13-1461-000 |
| |) | |
| UNS Electric, Inc. |) | Docket No. ER13-1462-000 |

APPLICANTS' RESPONSE TO MOTION TO AMEND AND PROTEST OF THE PUBLIC INTEREST ORGANIZATIONS

On July 3, 2013, the Public Interest Organizations (“PIOs”) filed a motion to amend their earlier-filed intervention in these proceedings. These parties filed the motion seeking leave to both add an additional nine parties to the pleading and to add comments on the proposed inter-regional tariff language submitted by the California Independent System Operator Corporation,¹ Northern Tier Transmission Group Applicants,² and WestConnect Applicants³ (collectively, “Applicants”) on May 10, 2013 (“compliance filing”). The PIOs state that, due to limited resources, they were unable to submit a completed pleading by the June 24, 2013, comment date.⁴

The Applicants do not oppose the PIO’s motion to amend, although it should be noted that some of the parties added to the intervention did not participate at all in the Order No. 1000 interregional stakeholder process described in the compliance filing. However, given the timing of this motion to amend and the fact that there were no comments or protests included in the PIOs original motion for intervention, the Applicants were not able to respond to the substantive arguments as of their response filed on July 9, 2013, to the comments of San Diego Gas & Electric, Southern California Edison and the

¹ Capitalized terms not otherwise defined herein have the meanings set forth in the proposed tariff changes contained in the compliance filing submitted in these proceedings.

² The Northern Tier Transmission Group Applicants are: Deseret Generation & Transmission Cooperative, Inc.; Idaho Power Company; NorthWestern Corporation; PacifiCorp; and Portland General Electric Company.

³ The WestConnect Applicants are: Arizona Public Service Company; Black Hills Power, Inc.; Black Hills Colorado Electric Utility Company, LP; Cheyenne Light, Fuel & Power Company; El Paso Electric Company; NV Energy; Public Service Company of Colorado; Public Service Company of New Mexico; Tucson Electric Power Company; and UNS Electric, Inc.

⁴ The PIOs refer to a June 25 comment date but their motion for intervention was filed on June 24 along with other interventions, comments and protests.

Non-Public Utilities.⁵ The Applicants will submit a separate response to the comments within the 15 day response period.

Respectfully submitted,

WESTCONNECT

ARIZONA PUBLIC SERVICE COMPANY

/s/ Raymond C. Myford
By _____
Raymond C. Myford
Manager, Federal Regulation for
Arizona Public Service Company

BLACK HILLS POWER, INC.

/s/ Kenna J. Hagan
By _____
Kenna J. Hagan
Attorney for Black Hills Power, Inc.

BLACK HILLS COLORADO ELECTRIC
UTILITY COMPANY, LP

/s/ Kenna J. Hagan
By _____
Kenna J. Hagan
Attorney for Black Hills Colorado
Electric Utility Company, LP

CHEYENNE LIGHT, FUEL & POWER
COMPANY

/s/ Kenna J. Hagan
By _____
Kenna J. Hagan
Attorney for Cheyenne Light, Fuel
& Power Company

EL PASO ELECTRIC COMPANY

/s/ Robin M. Nuschler
By _____
Robin M. Nuschler, Esq.
Attorney for El Paso Electric Company

NV ENERGY

/s/ Grace C. Wung
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Grace C. Wung
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⁵ The Non-Public Utilities are: Avista Corporation; Basin Electric Power Cooperative, Colorado Springs Utilities, Imperial Irrigation District, Los Angeles Department of Water and Power, Platte River Power Authority, Sacramento Municipal Utility District, Salt River Project Agricultural Improvement and Power District, Southwest Transmission Cooperative, Inc., Transmission Agency of Northern California, Tri-State Generation and Transmission Association, Inc., and Western Area Power Administration.

PUBLIC SERVICE COMPANY OF
COLORADO

/s/ Daniel P. Kline
By _____
Daniel P. Kline
Xcel Energy Services Inc.

PUBLIC SERVICE COMPANY OF NEW
MEXICO

/s/ David Zimmermann
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David Zimmermann
Attorney for Public Service
Company of New Mexico

TUCSON ELECTRIC POWER
COMPANY

/s/ Amy J. Welander
By _____
Amy J. Welander
Attorney for Tucson Electric Power
Company

UNS ELECTRIC, INC.

/s/ Amy J. Welander
By _____
Amy J. Welander
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NORTHERN TIER TRANSMISSION GROUP

DESERET GENERATION &
TRANSMISSION CO-OPERATIVE, INC.

/s/ Craig W. Silverstein
By _____
Craig W. Silverstein
Attorney for Deseret Generation &
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IDAHO POWER COMPANY

/s/ Julia Hilton
By _____
Julia Hilton
Attorney for Idaho Power Company

NORTHWESTERN ENERGY
CORPORATION

/s/ M. Andrew McLain
By _____
M. Andrew McLain
Attorney for NorthWestern Energy
Corporation

PACIFICORP

/s/ Mark M. Rabuano
By _____
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Attorney for PacifiCorp

PORTLAND GENERAL ELECTRIC
COMPANY

/s/ Donald J. Light

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CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION

/s/ Judith B. Sanders

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Attorneys for the California Independent
System Operator Corporation

Dated: July 9, 2013

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all of the parties listed on the official service lists for the above-referenced proceedings, 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 9th day of July, 2013.

/s/ Daniel Klein

Daniel Klein
Paralegal
Alston & Bird LLP