

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

**California Independent System) Docket No. ER13-2484-000
Operator Corporation)**

**ANSWER OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
TO COMMENTS OF PACIFIC GAS AND ELECTRIC COMPANY**

The California Independent System Operator Corporation (“ISO”) files this answer to the comments submitted in this proceeding by Pacific Gas and Electric Company (“PG&E”) in response to the ISO’s September 30, 2013 tariff amendment to improve the ability of the ISO to administer the generator interconnection queue and to address miscellaneous non-substantive tariff issues.¹ PG&E, which was the only party to file substantive comments, accurately states that the tariff amendment inadvertently included certain language that the ISO had agreed in the stakeholder process to remove from the tariff revisions. The ISO proposes to delete this language in a compliance filing.

¹ The ISO files this answer pursuant to 18 C.F.R. § 385.213. In addition to PG&E, which filed a motion to intervene and comments, the following entities filed only motions to intervene: the California Department of Water Resources State Water Project; Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California; City of Santa Clara, California, d/b/a Silicon Valley Power, and M-S-R Public Power Agency; Modesto Irrigation District; NRG Power Marketing LLC, GenOn Energy Management, LLC, Cabrillo Power I LLC, Cabrillo Power II LLC, El Segundo Power LLC, NRG Delta LLC, NRG Marsh Landing LLC, NRG California South LP, High Plains Ranch II, LLC, Long Beach Generation LLC, NRG Solar Alpine LLC, NRG Solar Borrego I LLC, NRG Solar Blythe LLC, NRG Solar Roadrunner LLC, and Avenal Solar Holdings LLC; and Southern California Edison Company.

I. Answer

PG&E accurately states that the ISO had agreed in the stakeholder process that preceded the September 30 tariff amendment to omit the phrase “at its option” from the proposed tariff revisions regarding verifications and material modification assessments that were to be included in the tariff amendment.² Specifically, the affected tariff provisions indicate the ISO may, “at its option” involve the participating transmission owner in the verification and review process. The ISO agrees that the phrase “at its option” should be removed as unnecessary and potentially confusing, as the ISO’s existing process includes transmission owner involvement.

Due to an oversight by the ISO, the proposed tariff revisions as filed with the Commission included the phrase intended for deletion.³ As PG&E notes, the ISO advised PG&E that it intended to address this matter in an answer and to agree to make a compliance filing to remove the phrase from the tariff.⁴

² PG&E at 2.

³ Specifically, the phrase was included in the proposed revisions to tariff section 25.1.2, section 1.3.4.1 of appendix S, article 3.4.5 of appendix T, section 4.4.3 of appendix U, section 6.9.2.2 of appendix Y, section 6.7.2.2 of appendix DD, and article 3.4.5 of appendix FF.

⁴ The phrase is also redundant of existing language in each of the tariff provisions listed above which states that the ISO may engage the services of the applicable participating transmission owner regarding verifications and material modification assessments. Further, the ISO’s normal practice is to consult with the applicable participating transmission owner on such matters.

II. Conclusion

For the foregoing reasons, the ISO proposes to delete the phrase “at its option” from its proposed tariff revisions on compliance. The Commission should accept the proposed September 30 tariff amendment with this change.

Respectfully submitted,

Nancy Saracino
General Counsel
Roger E. Collanton
Deputy General Counsel
Sidney M. Davies
Assistant General Counsel
The California Independent
System Operator Corporation
250 Outcropping Way
Folsom, CA 95630
Tel: (916) 608-7144
Fax: (916) 608-7296
E-mail: sdavies@caiso.com

/s/ Bradley R. Miliauskas

Michael Kunselman
Bradley R. Miliauskas
Alston & Bird LLP
The Atlantic Building
950 F Street, NW
Washington, DC 20004
Tel: (202) 239-3300
E-mail: michael.kunselman@alston.com
bradley.miliauskas@alston.com

Attorneys for the California Independent System Operator Corporation

Dated: October 29, 2013

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all of the parties listed on the official service list for the above-referenced 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 29th day of October, 2013.

/s/ Bradley R. Miliauskas
Bradley R. Miliauskas