

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

GridLiance West Transco LLC

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Docket No. ER17-706-003

**MOTION FOR INTERIM RATE RELIEF AND
REQUEST FOR EXPEDITED CONSIDERATION**

**To: The Honorable Carmen A. Cintron
Chief Administrative Law Judge**

**The Honorable Lawrence Brenner
Settlement Judge**

Pursuant to Rule 212 of the Rules of Practice and Procedures of the Federal Energy Regulatory Commission (Commission), 18 C.F.R. § 385.212, and Section 375.307(a)(1)(iv) of the Commission’s regulations, 18 C.F.R. § 375.307(a)(1)(iv), GridLiance West Transco LLC (GridLiance West) respectfully submits this Motion for Interim Rate Relief and Request for Expedited Consideration (Motion). GridLiance West is filing this Motion to satisfy one of the terms of the Joint Offer of Settlement and Settlement Agreement (Settlement), which was filed with eLibrary Accession No. 201803145199 and Associated Filing Identifier No. 146, pending Commission acceptance or approval in this proceeding.¹

Granting this request is in the public interest because it will ensure that the California Independent System Operator Corporation (CAISO) will be permitted to reduce its Transmission Access Charge (TAC) to reflect the reduction to GridLiance West’s Annual Transmission Revenue Requirement (ATTR) while the Commission reviews the Settlement. GridLiance West is

¹ GridLiance West has informed all parties to this proceeding of its intent to file this Motion and has received no objection from any party. The parties that support or do not oppose the Settlement are listed in the Settlement, which has been filed concurrently with this Motion.

authorized to state that all parties to this proceeding either support or do not oppose this Motion.² Granting this Motion will not prejudice the rights of any party to this proceeding.

As provided in Article IV of the Settlement, if the Commission does not accept or approve the Settlement in its entirety without material modification or condition, or accepts or approves the Settlement with condition or modification that is not accepted by the Settling Parties (as that term is defined in the Settlement) pursuant to Article IV, the Settlement shall be deemed withdrawn, and will be null and void and of no force and effect. Further, in such event, GridLiance West's ATRR shall be reinstated, subject to refund, and CAISO shall collect the difference between (1) the amounts collected using the interim settlement ATRR and (2) the amounts that would have been collected using GridLiance West's proposed ATRR, with interest calculated pursuant to 18 C.F.R. § 35.19a.

I. BACKGROUND

On December 29, 2016, GridLiance West filed with the Commission its Transmission Owner Tariff (TO Tariff), including a formula rate template (Template) and implementation protocols (Protocols) (together, Formula Rate).³ Several parties intervened in and protested GridLiance West's TO Tariff and Formula Rate filing. On February 24, 2017, the Commission issued a Letter Order Accepting and Suspending Filing, Subject to Refund and Further

² The parties to this proceeding include GridLiance West and the following intervenors: the California Department of Water Resources State Water Project (SWP); the California Municipal Utilities Association (CMUA); the Cities of Anaheim, Azusa, Banning, Colton, Pasadena, and Riverside, California (Six Cities); the City of Santa Clara, California, and the M-S-R Public Power Agency (Santa Clara/M-S-R); Modesto Irrigation District (MID); Northern California Power Agency (NCPA); Pacific Gas and Electric Company (PG&E); Sacramento Municipal Utility District (SMUD); Southern California Edison Company (SCE); Transmission Agency of Northern California (TANC); and Valley Electric Association, Inc. (VEA). The California Independent System Operator Corporation (CAISO), who intervened in this proceeding, has authorized GridLiance West to represent that it does not oppose this Motion.

³ *GridLiance West Transco LLC*, Application for Acceptance of Transmission Owner Tariff, Transmission Formula Rate and Approval of Transmission Rate Incentives, Docket No. ER17-706-000 (Dec. 29, 2016).

Commission Order.⁴ Subsequently, on August 17, 2017, the Commission issued an Order on Incentives and Participating Transmission Owner Tariff, and Establishing Hearing and Settlement Judge Procedures.⁵ On August 23, 2017, the Chief Judge issued an order appointing Settlement Judge Clark S. Cheney to facilitate settlement discussions,⁶ and on December 20, 2017, the Chief Judge issued an order designating Judge Lawrence Brenner as the substitute Settlement Judge.⁷

The parties and Commission Trial Staff engaged in an informal discovery process and participated in several technical and in-person settlement conferences. Based on these exchanges, the Settling Parties listed in the Settlement reached agreement on all issues set for hearing in this proceeding, resulting in this Motion and the Settlement being filed concurrently in this docket.

II. MOTION

The Commission may, for good cause shown, permit a public utility (in this case, GridLiance West) to collect a rate different than the rate schedule on file with the Commission. Further, Rule 307(a)(1)(iv) of the Commission's Revised General Rules authorizes the Chief Administrative Law Judge to act on uncontested motions that would result in lower interim settlement rates, pending Commission action on settlement agreements.⁸

⁴ *GridLiance West Transco LLC*, Order Accepting and Suspending Filing, Subject to Refund and Further Commission Order, 158 FERC ¶ 62,136 (2017) (February 24 Letter Order).

⁵ *GridLiance West Transco LLC*, Order on Incentives and Participating Transmission Owner Tariff, and Establishing Hearing and Settlement Judge Procedures, 160 FERC ¶ 61,003 (2017) (August 17 Order).

⁶ *GridLiance West Transco LLC*, Order of Chief Judge Designating Settlement Judge, Docket No. ER17-706-000 (Aug. 23, 2017).

⁷ *GridLiance West Transco LLC*, Order of Chief Judge Making Substitute Designation of Settlement Judge, Docket No. ER17-706-000 (Dec. 20, 2017).

⁸ Rule 307(a)(1)(iv) authorizes the Chief Administrative Law Judge to act on uncontested motions that would result in lower interim settlement rates. See 18 C.F.R. § 375.307(a)(1)(iv). No party has indicated to GridLiance West that it objects to this Motion, or to CAISO collecting a reduced ATRR on behalf of GridLiance West pending Commission action on the Settlement.

Good cause exists to grant this Motion. Transmission service customers that pay the CAISO's TAC rate will be able to benefit from reduced rates that will result from the implementation of the changes to the Formula Rate set forth in the Settlement.⁹ The Settlement provides for the filing of this Motion so that reduced rates can be implemented as soon as possible during the current Rate Year and the refund obligations of GridLiance West will be minimized. Accordingly, good cause exists to grant this unopposed Motion to make the revised Formula Rate effective on an interim basis.

In accordance with the August 30, 2016, Notice to the Public regarding Motions to Place Interim Settlement Rates into Effect issued by Acting Chief Administrative Law Judge Carmen A. Cintron, GridLiance West seeks to implement settlement rates based on its 2018 ATRR of \$19,551,512,¹⁰ which is calculated using the revised Formula Rate Template that the parties agreed to in the Settlement. The settlement rates will be lower than the current rates based on GridLiance West's currently effective 2018 ATRR of \$21,262,828, which was calculated using the filed Formula Rate Template.

III. REQUEST FOR EXPEDITED CONSIDERATION

GridLiance West requests that the Chief Judge shorten the fifteen (15)-day notice period for responses to this Motion prescribed by Rule 213(d) of the Commission's Rule of Practice and Procedure, 18 C.F.R. § 385.213(d), to six (6) days, making any responses due by March 19, 2018. As explained above, GridLiance West does not anticipate any opposition to this Motion. Therefore, GridLiance West requests that the Chief Judge grant this Motion no later than March 23, 2018.

⁹ As posted in its annual projection, the GridLiance West Formula Rate resulted in an initial ATRR for 2018 of \$21,262,828. See GridLiance West Transco Rate Year 2018 Annual Projection, *available at* <http://www.gridliance.com/regulatory/>. As revised and posted concurrently on its website, the revised settlement Formula Rate for the same period calculates an ATRR of \$19,551,512.

¹⁰ GridLiance West's revised populated formula rate reflecting all revisions agreed-to in settlement is available at <http://www.gridliance.com/regulatory/>.

This expedited treatment will allow CAISO to settle all invoices from January 1, 2018 and after using the reduced interim rates. GridLiance West requests waiver of any applicable requirements, including waiver of the sixty (60)-day notice and filing requirement, necessary to permit the interim rates to go into effect as of January 1, 2018.

III. CONCLUSION

For these reasons, GridLiance West respectfully requests that the Chief Administrative Law Judge grant this Motion for authorization to implement the settlement Formula Rate on an interim basis, pending Commission approval or acceptance of the Settlement, and the request for expedited consideration.

Respectfully submitted,

/s/ William D. DeGrandis

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Dated: March 14, 2018

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused to be served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding in accordance with the requirements of Rule 2010 of the Rules of Practice and Procedure, 18 C.F.R. § 385.2010.

Dated at Washington, DC this 14th day of March, 2018.

/s/ Jenna McGrath
Jenna McGrath

FERC rendition of the electronically filed tariff records in Docket No. ER17-00706-003

Filing Data:

CID: C005519

Filing Title: GridLiance West Motion for Interim Rates

Company Filing Identifier: 166

Type of Filing Code: 1380

Associated Filing Identifier: 146

Tariff Title: GridLiance Formula Rate Template Initial Filing

Tariff ID: 33

Payment Confirmation:

Suspension Motion: N

Tariff Record Data:

Record Content Description, Tariff Record Title, Record Version Number, Option Code:

Formula Rate, Appendix III, 3.0.0, A

Record Narrative Name:

Tariff Record ID: 58

Tariff Record Collation Value: 20000 Tariff Record Parent Identifier: 0

Proposed Date: 2018-01-01

Priority Order: 500

Record Change Type: Change

Record Content Type: 2

Associated Filing Identifier:

This is a PDF section and we cannot render PDF in a RTF document.

Record Content Description, Tariff Record Title, Record Version Number, Option Code:

Protocols, Appendix IV, 3.0.0, A

Record Narrative Name:

Tariff Record ID: 59

Tariff Record Collation Value: 21000 Tariff Record Parent Identifier: 0

Proposed Date: 2018-01-01

Priority Order: 500

Record Change Type: Change

Record Content Type: 2

Associated Filing Identifier:

This is a PDF section and we cannot render PDF in a RTF document.

Document Content(s)

GWTMotionforInterimRates.PDF.....1-6

FERC GENERATED TARIFF FILING.RTF.....7-7