

November 3, 2020

**VIA ELECTRONIC FILING**

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

**Re: GridLiance West LLC  
Docket No. ER21-\_\_\_\_-000  
Transmission Revenue Balancing Account Adjustment 2021 Annual Update**

Dear Secretary Bose:

Pursuant to section 205 of the Federal Power Act<sup>1</sup> and Part 35 of the Federal Energy Regulatory Commission's (FERC or Commission) regulations,<sup>2</sup> GridLiance West LLC (GridLiance West) hereby submits for filing revisions to Appendix I of its Transmission Owner (TO) Tariff to reflect the 2021 Annual Update of its Transmission Revenue Balancing Account Adjustment (TRBAA). The TRBAA is used by the California Independent System Operator Corporation (CAISO) in calculating its Transmission Access Charges (TAC) for the 2021 Rate Year. GridLiance West requests any necessary waivers by the Commission to allow this filing to be accepted for filing and approved by the Commission to become effective as of January 1, 2021. The tariff record attached to this filing is the same as that included with ER21-228, but is being resubmitted to reflect the correct filing code in e-tariff.

**I. BACKGROUND**

The TRBAA is a ratemaking mechanism designed to ensure that all Transmission Revenue Credits (as defined in the CAISO Tariff) and adjustments for any over- or under-recovery of GridLiance West's annual Transmission Revenue Requirement (TRR) flow through to transmission customers. Section 26.1 of the CAISO Tariff requires that PTOs make an annual TRBAA filing, and section 5.5 of GridLiance West's TO Tariff sets forth the calculation for determining the TRBAA. GridLiance West is obligated to adjust the Transmission Revenue Balancing Account (TRBA) based on its principal balance as of September 30 of the prior year and provide a forecast of Transmission Revenue Credits for the next year.<sup>3</sup> In this case, the TRBA adjustment consists of any wheeling revenue received during the 2019 to 2020 TRBA accounting period by GridLiance West from CAISO in excess of its TRR for the High Voltage Transmission System (HVTS), and any surplus or shortfall in the collection of the TRR associated with the facilities, based on actual gross load.

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<sup>1</sup> 16 U.S.C. § 824d (2018).

<sup>2</sup> 18 C.F.R. § 35.13 (2018).

<sup>3</sup> See *Valley Electric Ass'n, Inc.*, 150 FERC ¶ 61,146 (2015) (reh'g denied).

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On September 14, 2017, GridLiance West closed on its acquisition of the HVTS from Valley Electric Association, Inc. (VEA). Pursuant to Section 2.3 of the Asset Purchase Agreement with VEA, GridLiance West assumed both the HVTS and the associated high-voltage TRBA following the September 14, 2017 closing date. GridLiance West's FERC-approved transmission rates became effective the following day, on September 15, 2017. On January 17, 2020, GridLiance West filed the 2020 Annual Update to its rates for its TRBA, which became effective January 1, 2020.

## **II. TRBAA 2020 ANNUAL UPDATE**

As documented in the Prepared Direct Testimony of Don Zybak (Exhibit No. GLW-001) and the attached supporting workpapers (Exhibit Nos. GLW-002 through GLW-004), GridLiance West's revised High Voltage TRBAA for 2020 is (\$2,992,094). GridLiance West's Base TRR is determined pursuant to its formula rate in Appendix III of its TO Tariff, which is updated annually and posted to GridLiance West's corporate website.<sup>4</sup> The TRBAA is the sum of the balance existing in the TRBA as of September 30, 2020, a good faith estimate of the TRCs that GridLiance West will receive during 2021, as well as interest associated with the current balance, calculated pursuant to the Commission's regulations and the CAISO Tariff.

## **III. EFFECTIVE DATE AND TARIFF FILING**

GridLiance West requests an effective date of January 1, 2021 for the revisions to Appendix I of its TO Tariff filed in connection with the 2021 Annual Update to the TRBAA.

## **IV. COMMUNICATIONS**

All communications with respect to this filing should be addressed to the persons identified below:

Kathryn L Patton  
Gregory D. Jones  
GridLiance West LLC  
201 E. John Carpenter Freeway  
Suite 900  
Irving, TX 75062  
469-718-7050  
[kpatton@gridliance.com](mailto:kpatton@gridliance.com)  
[gjones@gridliance.com](mailto:gjones@gridliance.com)

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<sup>4</sup> GridLiance West posts all information and updates to its formula rate on the following link:  
<http://www.gridliance.com/gridliance-west/>.

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**V. DOCUMENTS SUBMITTED**

GridLiance West submits the following documents in addition to this transmittal letter:

- Clean and redline copies of GridLiance West's revised Appendix I to its TO Tariff
- Exhibit No. GLW-001, Prepared Direct Testimony of Donald E. Zybak, Jr.
- Exhibit No. GLW-002, Calculation of the TRBAA Balance for 2020
- Exhibit No. GLW-003, Overview of TRBA for 2020
- Exhibit No. GLW-004, Calculation of Projected Transmission Revenue Credits for 2020

Respectfully submitted,

*/s/ Kathryn L Patton*

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**Counsel for GridLiance West LLC**

**APPENDIX I****Transmission Revenue Requirement and TRBAA**

1. The GridLiance West Base Transmission Revenue Requirement shall be determined pursuant to the formula rate in Appendix III of this TO Tariff.
2. The TRBAA is ~~(\$1,304,289)~~~~(\$2,992,094)~~ for the twelve-month period effective January 1, 20~~21~~~~20~~, as computed in accordance with Section 5.5 of this TO Tariff and the ISO Tariff.
3. All of GridLiance West's facilities and Entitlements placed under the ISO's Operational Control are related to High Voltage Facilities as defined in the ISO Tariff.
4. The TRBAA will be recalculated annually consistent with the ISO Tariff, approved by the FERC, and provided to the ISO.

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## **APPENDIX I**

### **Transmission Revenue Requirement and TRBAA**

1. The GridLiance West Base Transmission Revenue Requirement shall be determined pursuant to the formula rate in Appendix III of this TO Tariff.
2. The TRBAA is (\$2,992,094) for the twelve-month period effective January 1, 2021, as computed in accordance with Section 5.5 of this TO Tariff and the ISO Tariff.
3. All of GridLiance West's facilities and Entitlements placed under the ISO's Operational Control are related to High Voltage Facilities as defined in the ISO Tariff.
4. The TRBAA will be recalculated annually consistent with the ISO Tariff, approved by the FERC, and provided to the ISO.

File [2020-10-28 - GLW-001 Zybak Testimony.PDF] cannot be converted to PDF. (To download this file in its original format, please use the filename hyperlink from your search results. If you continue to experience difficulties, or to obtain a PDF generated version of files, please contact the helpdesk at [ferconlinesupport@ferc.gov](mailto:ferconlinesupport@ferc.gov), or, call 866-208-3676 from 9AM to 5PM EST, weekdays. Please allow at least 48 hours for your helpdesk request to be processed.)

Exhibit GLW-002

GLW TRBAA Calculation

Line No.	Invoice Year / Calendar Year	2019	2019	2019	2020	2020	2020	2020	2020	2020	2020	2020	2020	Total
	Invoice Month / Calendar Month	October	November	December	January	February	March	April	May	June	July	August	September	
	Trade Month	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	
1	In Service Days for Trade Month	30	31	30	31	31	29	31	30	31	30	31	31	
2	Annual Base TRR	36,024,402	36,024,402	36,024,402	36,024,402	41,167,622	41,167,622	41,167,622	41,167,622	41,167,622	41,167,622	41,167,622	41,167,622	
<b>TRBA Calculation</b>														
3	Prorated Base TRR	2,952,820	3,051,247	2,952,820	3,051,247	3,486,875	3,261,915	3,486,875	3,374,395	3,486,875	3,374,395	3,486,875	3,486,875	
4	Actual TAC Payments - Initial for Trade Month	3,226,577	2,834,857	2,611,839	2,718,287	2,700,588	2,715,348	2,912,509	2,752,273	3,027,458	3,341,899	3,829,048	4,171,590	
5	Actual TAC Payments - Refunds & Adjustments <sup>2</sup>													
	From CAISO Invoices	12,640	66,351	(5,974)	13,768	20,366	61,347	321,823	(22,609)	(1,989)	(23,671)	24,539	141,433	
6	Actual Wheeling Payments - Initial for Trade Month	102,716	28,163	46,809	86,165	72,178	49,366	26,571	31,998	64,578	168,525	877,420	818,617	
7	Actual Wheeling Payments - Refunds and Adjustments	(1,836)	(147)	(829)	-	(330)	(202)	139	(5,173)	(5,982)	(2,201)	3,874	(1,198)	
8	Net Payments After Refunds	3,340,097	2,929,224	2,651,845	2,818,220	2,792,802	2,825,860	3,261,043	2,756,489	3,084,064	3,484,553	4,734,880	5,130,441	
9	(Over) Under Collection	(387,277)	122,023	300,974	233,027	694,073	436,055	225,832	617,906	402,811	(110,157)	(1,248,005)	(1,643,566)	
<b>TRBA Monthly Balance</b>														
10	Beginning TRBA Balance	(305,136)	(692,413)	(570,390)	(269,416)	(43,411)	650,662	1,086,717	1,316,734	1,934,641	2,337,451	2,246,830	998,825	
11	(Over) Under Collection	(387,277)	122,023	300,974	233,027	694,073	436,055	225,832	617,906	402,811	(110,157)	(1,248,005)	(1,643,566)	
12	Interest				(7,022)		4,186				19,536			
13	Ending TRBA Balance	(692,413)	(570,390)	(269,416)	(43,411)	650,662	1,086,717	1,316,734	1,934,641	2,337,451	2,246,830	998,825	(644,741)	(644,741)
14	Last Quarter Interest													11,871
15	Ending Balance - TRBAA													(632,870)
<b>Interest Calculation</b>														
16	Interest Rate	Note 1	0.46%	0.44%	0.46%	0.42%	0.39%	0.42%	0.39%	0.40%	0.39%	0.29%	0.29%	0.28%
17	Average Balance	(Line 10 + Line 13)/2	(498,775)	(631,402)	(419,903)	(156,414)	303,625	868,690	1,201,726	1,625,688	2,136,046	2,292,141	1,622,827	177,042
18	Interest	Line 16 * Line 17	(2,290)	(2,805)	(1,928)	(657)	1,193	3,649	4,679	6,541	8,317	6,659	4,715	498
19	Quarterly Compounding			(7,022)			4,186			19,536				11,871
Note 1	FERC Interest Rates <sup>1</sup>													
	Annual Rate	5.42%	5.42%	5.42%	4.96%	4.96%	4.96%	4.75%	4.75%	4.75%	3.43%	3.43%	3.43%	
	Days in Invoice / Calendar Month	31	30	31	31	29	31	30	31	30	31	31	30	

<sup>1</sup> Source: <https://ferc.gov/enforcement-legal/enforcement/interest-calculation-rates-and-methodology>

<sup>2</sup> Includes Generator Interconnection Process Forfeited Deposit Allocation

**Exhibit GLW-003**



**TRANSMISSION REVENUE  
BALANCING ACCOUNT ADJUSTMENT  
OVERVIEW  
CALENDAR YEAR 2020**

Prepared by  
GridLiance West LLC

<b>DESCRIPTION</b>	<b>TOTAL</b>	<b>REFERENCE</b>
TRBA Balance 9/30/2020	(\$632,870)	GLW-002
Transmission Revenue Credit Forecast 2021	(\$2,359,224)	GLW-004
TRBA Adjustment 2021	(\$2,992,094)	TO Tariff Appendix I



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

**GRIDLIANCE WEST LLC**

**DOCKET NO. ER21-\_\_\_\_-000**

**VERIFICATION OF TESTIMONY**

Pursuant to 18 C.F.R. §385.2005(b)(3), I verify under penalty of perjury that I have read and know the contents of the foregoing Direct Testimony and the exhibits annexed thereto; that they were prepared by me or under my direction; and that the answers contained therein are true and correct to the best of my knowledge, information and belief.

DocuSigned by:

*Donald E. Zybak, Jr.*

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Donald E. Zybak, Jr.

Date: October 27, 2020

FERC rendition of the electronically filed tariff records in Docket No. ER21-00313-000

Filing Data:

CID: C005519

Filing Title: GLW TRBAA 2021 Annual Update Filing

Company Filing Identifier: 11032020

Type of Filing Code: 10

Associated Filing Identifier:

Tariff Title:

Tariff ID: 33

Payment Confirmation:

Suspension Motion: Y

Tariff Record Data:

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

Appendix I, TRR and TRBAA, 6.0.0, A

Record Narrative Name:

Tariff Record ID: 56

Tariff Record Collation Value: 1800 Tariff Record Parent Identifier: 0

Proposed Date: 2021-01-01

Priority Order: 500

Record Change Type: Change

Record Content Type: 1

Associated Filing Identifier:

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Document Content(s)

2020-11-3 - GLW TRBAA 2020 Annual Update - Trnsmttl Ltr.DOCX.....1  
2020-10-28-GLW TRBAA 2020 Filing-Appendix I-Redline.PDF.....4  
2020-10-28-GLW TRBAA 2020 Filing-Appendix I-Clean.PDF .....5  
2020-10-28 - GLW-001 Zybak Testimony.PDF.....6  
2020-10-28 - Exhibit No. GLW-002 GLW TRBAA 2021.PDF .....7  
2020-10-28 - Exhibit No. GLW-003 TRBAA Overview 2021.PDF .....8  
2020-10-28 - Exhibit No. GLW-004 GLW TRBAA 2021.PDF .....10  
2020-10-28 - Verification of Testimony [Executed].PDF .....11  
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