

June 29, 2016

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

Dear Ms. Bose:

Pursuant to Section 35.13 of the Federal Energy Regulatory Commission's ("Commission" or "FERC") Regulations under the Federal Power Act (18 C.F.R. § 35.13), Southern California Edison Company ("SCE" or "Participating TO") tenders for filing the First Amended Large Generator Interconnection Agreement ("Amended LGIA") among NextEra Blythe Solar Energy Center, LLC, ("Interconnection Customer"), SCE and the California Independent System Operator Corporation ("CAISO") (collectively, the "Parties"), Service Agreement No. 97 under SCE's Transmission Owner Tariff ("TO Tariff"), FERC Electric Tariff, Volume No. 6.

The documents submitted with this filing consist of this letter of transmittal and all attachments hereto, and the Amended LGIA in both clean and redline formats.

### Background

On November 25, 2010, Palo Verde Solar II LLC, CAISO and SCE entered into a large generator interconnection agreement ("Original LGIA"). The Original LGIA provides the terms and conditions pursuant to which SCE and the CAISO will provide Interconnection Service<sup>1</sup> for the Blythe Solar Power Project; SCE will design, procure, construct, own, operate, and maintain the Participating TO's Interconnection Facilities, the Participating TO's Reliability Network Upgrades and the Participating TO's Delivery

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<sup>1</sup> All capitalized terms used herein, and not otherwise defined, have the meanings ascribed to such terms in the LGIA.

Network Upgrades required to interconnect the Blythe Solar Power Project to the CAISO Controlled Grid; and Palo Verde Solar II LLC will pay for such service and facilities. The Original LGIA was accepted for filing by the FERC in a letter order dated February 1, 2011 in Docket No. ER11-2316-000 and was assigned an effective date of December 9, 2010.

On July 12, 2012, the NextEra Blythe Solar Energy Center, LLC purchased the Blythe Solar Power Project from Palo Verde Solar II, LLC. As a result of the sale of the Blythe Solar Power Project, the Participating TO, CAISO, Palo Verde Solar II, LLC, and NextEra Blythe Solar Energy Center, LLC entered into the Consent To Assignment For Large Generator Interconnection Agreement (“Consent”) pursuant to which the LGIA was assigned from Palo Verde Solar II, LLC to NextEra Blythe Solar Energy Center, LLC. As stipulated in the Consent, following the Blythe Solar Power Project asset sale closing date, the LGIA would be amended to: i) allocate the financing obligation to NextEra Blythe Solar Energy Center, LLC for the Participating TO’s Plan of Service Reliability Network Upgrades; and ii) develop new prospective project milestones for NextEra Blythe Solar Energy Center, LLC subject to acceptance by the Participating TO and CAISO.

On January 4, 2013, the Interconnection Customer submitted a request to the CAISO to downsize the megawatt capacity of their proposed Blythe Solar Power Project from 1000 MW to 485 MW. In accordance with the CAISO Appendix GG, the CAISO and SCE performed the generator downsizing study (“Generator Downsizing Study”) for the Blythe Solar Power Project. The study results identified that the generating facility, at a reduced capacity of 485 MW, could be accommodated via a single generation tie-line position at Colorado River Substation (in lieu of the two generation tie-line positions originally identified to accommodate the 1000 MW generating facility).

Additionally, the Interconnection Customer provided written notification to the Participating TO and CAISO that the generating facility name is changed from the Blythe Solar Power Project to the Dracker Project (“Project”).

Amended LGIA

The Amended LGIA reflects: (a) the Interconnection Customer’s request to reduce the Project’s capacity from 1000 MW to 458 MW and change the Generating Facility technology from solar thermal to solar photovoltaic; (b) revisions to the Interconnection Facilities and Network Upgrades as a result of the capacity reduction and final engineering; (c) a revised Interconnection Facilities Cost, Plan of Service Reliability Network Upgrades Cost and One-Time Cost due to the capacity reduction and final engineering; (d) corresponding changes to the Interconnection Facilities Payment and Reliability Network Upgrades Payment; (e) a decrease in the Interconnection Facilities Charge due to a decrease in the Interconnection Facilities Cost and a decrease in the Customer-Financed Monthly Rate for Non-ISO-Controlled Facilities; (f) updated language to reflect the revised added facilities rate; (g) a change in project name from Blythe Solar Power Project to Dracker Project; (h) modifications to the CAISO’s pro forma Large Generator Interconnection Agreement to conform with Appendix HH of the CAISO’s tariff; (i) updated milestones to reflect the current status of the Generating Facility, Interconnection Facilities and Network Upgrades; and (j) other administrative changes.

The costs for the Participating TO’s Interconnection Facilities and Plan of Service Reliability Network Upgrades have been revised as shown in the table below.

	Interconnection Facilities Cost	Plan of Service Reliability Network Upgrades Cost	One-Time Cost	Total Cost
Original LGIA	\$13,071,000	\$4,732,000	\$0	\$17,803,000
Revised LGIA	\$3,533,477	\$2,600,000	\$189,724	\$6,323,201
Difference	(\$9,537,523)	(\$2,132,000)	\$189,724	(\$11,479,799)

As a result of the revised cost of the facilities, the Interconnection Facilities Payment and Reliability Upgrades Payment have been revised as shown in the following table:

Interconnection Facilities Payment and Reliability Network Upgrades Payment

	Interconnection Facilities Payment <sup>2</sup>	Reliability Network Upgrades Payment	Project Payment
Original LGIA	\$13,071,000	\$0	\$13,071,000
Revised LGIA	\$3,723,201	\$2,600,000 <sup>3</sup>	\$6,323,201
Difference	(\$9,347,799)	\$2,600,000	(\$6,747,799)

In this filing, SCE is also revising the monthly charge to recover the revenue requirement for the ownership, operation, maintenance costs, and other on-going costs for the added facilities necessary to interconnect the customer to SCE's system. The added facilities charges have been based on rates most recently adopted by the California Utilities Commission ("CPUC") for application to SCE's retail electric customers. Pursuant to CPUC Decision 15-11-021, dated November 12, 2015, rendered in Application 13-11-003, the monthly rates for added facilities applicable to retail customers were modified for services rendered on and after January 1, 2016. The previous and revised CPUC rate applicable to the Amended LGIA is set forth below.

<b>Added Facilities Rate Description</b>	<b>Previous Rate</b>	<b>Revised Rate</b>
Customer-Financed Monthly Rate for Non-ISO-Controlled Facilities	0.39%	0.38%

The Commission accepted the revised rate in a letter order in Docket No. ER16-773-000, dated March 8, 2016.

As a result of the decrease in the revised added facilities rate and the Interconnection Facilities Cost, the Interconnection Facilities Charge will also change as shown in the tables below.

<sup>2</sup> The Interconnection Facilities Payment includes the estimated One-Time Cost.

<sup>3</sup> Pursuant to the terms and conditions of the Consent, the Interconnection Customer is responsible for the Reliability Network Upgrades Payment solely related to the cost of the Participating TO's Plan of Service Reliability Network Upgrades.

Interconnection Facilities Charge

Effective	Customer-Financed Monthly Rate for Non-ISO-Controlled Facilities	Estimated	
		Interconnection Facilities Cost	Interconnection Facilities Charge
Original LGIA	0.39%	Electric Generating Units 1 & 2: \$11,830,000 Electric Generating Units 3 & 4: \$1,241,000	Electric Generating Units 1 & 2: \$46,137.00 Electric Generating Units 3 & 4: \$4,839.90
Amended LGIA	0.38%	\$3,533,477	\$13,427.21
Difference		(\$9,537,523)	(\$37,549.69)

Other Filing Requirements

SCE respectfully requests, pursuant to Section 35.11 (18 C.F.R. § 35.11) of the Commission’s regulations, waiver of the 60-day prior notice requirements specified in Section 35.3 (18 C.F.R. § 35.3), and requests the Commission to assign an effective date of June 30, 2016 to the Amended LGIA, which is the day after the date of this filing. Such waiver would be consistent with the Commission’s policy set forth in Central Hudson Gas & Electric Corp., et al., 60 FERC ¶ 61,106 (1992), *reh’g denied*, 61 FERC ¶ 61,089 (1992), that waiver of the 60-day prior notice requirement will generally be granted for filings that reduce rates and charges, such as rate decreases and where good cause is shown. Good cause exists because the waiver will enable the contract to reflect the agreement between the parties, such that SCE may begin to accurately bill the Interconnection Customer for the reduced Interconnection Facilities Charge. Moreover, the granting of this waiver is uncontested by the Interconnection Customer and will not have any impact on SCE’s other rate schedules.

No expenses or costs included in the rates tendered herein have been alleged or judged in any administrative or judicial proceeding to be illegal, duplicative, or unnecessary costs that are demonstrably the product of discriminatory employment practices.

SCE believes that the data contained in this letter provide sufficient information upon which to accept this filing; however, to the extent necessary, SCE requests that the Commission waive its filing requirements contained in Sections 35.5 and 35.13 (18 C.F.R. § 35.5 and 35.13) of the Commission's regulations.

SCE believes this filing conforms to any rule of general applicability and to any Commission order specifically applicable to SCE, and has made copies of this letter and all enclosures available for public inspection in SCE's principal office located in Rosemead, California. SCE has mailed copies to those persons whose names appear on the mailing list enclosed.

SCE requests that all correspondence, pleadings, and other communications concerning this filing be served upon:

Rebecca Furman  
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SCE also requests that an additional copy of any correspondence and orders be sent to the undersigned at [James.Cuillier@sce.com](mailto:James.Cuillier@sce.com).

Very truly yours,



JAMES A. CUILIER

FEDERAL ENERGY REGULATORY COMMISSION

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