

July 20, 2007

Honorable Kimberly D. Bose
Secretary
FEDERAL ENERGY REGULATORY COMMISSION
888 First Street, N.E.
Washington, D.C. 20426

RE: [DOCKET NO. ER07-1034](#)

Dear Secretary:

Enclosed please find for filing with the Commission an electronic version of the **MOTION OF SOUTHERN CALIFORNIA EDISON COMPANY FOR LEAVE TO ANSWER AND ANSWER TO THE PROTEST OF GREEN BORDERS GEOTHERMAL, LLC** in the above-captioned matter.

Your courtesy and cooperation in this matter are appreciated.

Very truly yours,

/s/ Rebecca A. Furman

[Rebecca A. Furman](#)

Enclosures

cc: All Parties of Record

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Southern California Edison Company)
_____)

Docket No. ER07-1034

MOTION OF SOUTHERN CALIFORNIA EDISON COMPANY FOR LEAVE TO
ANSWER AND ANSWER TO THE PROTEST OF GREEN BORDERS
GEOHERMAL, LLC

Southern California Edison Company (“SCE”) hereby moves for leave to answer and answers the Protest of Green Borders Geothermal, LLC (“Green Borders”) in the above-captioned proceeding.

I. MOTION FOR LEAVE TO ANSWER

Although answers to protests are generally prohibited under Rule 213(a)(2) of the Commission’s regulations, the Commission has made it clear that it will waive the application of Rule 213(a)(2) and allow such answers when they ensure a complete and accurate record in the case and where, as here, the information provided will aid in the Commission’s understanding and resolution of the issues raised in reply comments.¹ Because this Answer provides necessary additional information, SCE respectfully requests that the Commission consider this response to aid in its resolution of the issue.²

¹ See, e.g., *Delmarva Power & Light Co.*, 93 FERC ¶61,098 at 61,259 (2000) (allowing answer in order to “insure a complete and accurate record”); *Northern Natural Gas Co.*, 91 FERC ¶ 61,212 at 61,769 (2000) (allowing an answer “to achieve a complete and accurate record”).

² See, e.g., *Carolina Power & Light Co.*, 93 FERC ¶ 61,032 at 61,068 (2000) (allowing an answer where the answer would assist in the Commission’s “understanding and resolution of the issues raised”); *El Paso Natural Gas Co.*, 56 FERC ¶ 61,038, at 61,139 (1991) (explaining that the utility conceded “that the Commission in its discretion may accept an answer to a request for rehearing in order to have a more complete record on which to

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II. ANSWER

This proceeding arises from the application of Green Borders to interconnect a 62 MW geothermal generating facility (the “Project”) to SCE’s transmission system. Specifically, Green Borders sought to interconnect the Project to the non-SCE owned Dixie Valley – Oxbow 220 kV transmission line at the proposed Aurora 230 kV switching station, with the point of interconnection to the California Independent System Operator (“CAISO”) Controlled Grid at SCE’s Control 115 kV Substation.

On June 14, 2007, SCE, jointly with the CAISO, filed an unexecuted Large Generator Interconnection Agreement (“LGIA”) with the Commission in this docket. The LGIA was a result of negotiations between Green Borders, the CAISO and SCE. The parties were able reach consensus on most issues regarding the LGIA, however the Network Upgrades remained at issue, and thus Green Borders requested that SCE file the LGIA unilaterally in accordance with the CAISO Tariff provisions. Green Borders protested this filing.

Green Borders, in its Protest, questioned the reasonableness of the Network Upgrades associated with interconnecting the Project. Specifically, Green Borders has questioned whether certain mechanisms such as remedial action schemes or congestion management could mitigate the need for the required Network Upgrades, and therefore lessen the costs associated with the Project.

While SCE has reviewed Green Borders’ Protest, it has not yet had the opportunity to analyze the impacts to the reliability and safety of the electrical system in order to determine the feasibility of Green Borders’ suggested alternatives. Additionally, SCE understands that the CAISO does not object to studying the alternatives proposed by Green Borders. Therefore, SCE does not oppose Green Borders request that the Commission set this matter for hearing, suspend

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base its decision,” and allowing the answer because it “will not delay the proceeding or otherwise prejudice any party”). To the extent necessary, SCE requests waiver of Rule 213(a)(2).

the hearing procedures, and implement settlement procedures by which the parties can engage in further negotiations in order to resolve the matters raised herein.

III. CONCLUSION

For the foregoing reasons, SCE respectfully requests that the Commission set this matter for hearing, suspend the hearing procedures, and implement settlement procedures by which the parties can engage in further negotiations in order to resolve the concerns expressed by Green Borders.

Respectfully submitted,

/s/ Rebecca Austin Furman

By: Rebecca Austin Furman

Attorney for
SOUTHERN CALIFORNIA EDISON COMPANY

Dated: July 20, 2007

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing **MOTION OF SOUTHERN CALIFORNIA EDISON COMPANY FOR LEAVE TO ANSWER AND ANSWER TO THE PROTEST OF GREEN BORDERS GEOTHERMAL, LLC** upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Rosemead, California, this 20th day of July, 2007.

Nicole Broadwater, Project Analyst
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