

April 23, 2021

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

**Re: California Independent System Operator Corporation –  
Filing of Certificate of Concurrence Relating to the non-conforming Large  
Generator Interconnection Agreement  
Submitted in Docket No. ER21-1699**

**Docket No. ER21-\_\_\_\_-000**

Dear Secretary Bose:

The California Independent System Operator Corporation (“CAISO”) hereby submits for filing a Certificate of Concurrence with respect to the non-conforming Large Generator Interconnection Agreement (“LGIA”) among Luz Solar Partners Ltd., IX, LP (“Interconnection Customer”), Southern California Edison Company (“SCE”), and the CAISO (“Kramer Junction 9 LGIA”).<sup>1</sup>

## **I. Overview and Designated Filer**

On April 16, 2021, SCE submitted the Kramer Junction 9 LGIA in Docket No. ER21-1699, with a requested effective date of April 18, 2021. In that filing, SCE explained that the non-conforming Kramer Junction 9 LGIA deviates from the CAISO *pro forma* LGIA to account for the situation where an interconnection customer desires to convert its interconnection from California Public Utilities Commission–jurisdictional service to Commission–jurisdictional service.

Rather than filing a duplicate version of the Kramer Junction 9 LGIA under the CAISO tariff, the CAISO is submitting a concurrence tariff record. The concurrence tariff record is designated under the CASO tariff as Service Agreement No. 6695.

---

<sup>1</sup> The CAISO submits this filing pursuant to Sections 35.1 and 131.52 of the Commission’s regulations, 18 C.F.R. §§ 35.1, 131.52.

SCE serves as the “designated filer” as to the Kramer Junction 9 LGIA pursuant to the Joint Tariff Filing procedures outlined in Order No. 714.<sup>2</sup> As the Participating Transmission Owner and a party to the LGIA, SCE filed the service agreement under SCE’s FERC Electric Tariff, Original Volume No. 6 and designated it as Service Agreement No. 264.

## **II. Proposed Effective Date and General Request for Waivers**

The CAISO respectfully requests any waivers of the Commission’s filing regulations necessary to establish an effective date of April 18, 2021 for its Certificate of Concurrence for the Kramer Junction 9 LGIA, consistent with the April 18, 2021 effective date that SCE requested in its April 16, 2021 filing. To the extent that the enclosed materials and information do not meet the detailed filing requirements of the Commission’s regulations, the CAISO respectfully requests that the Commission grant any necessary waivers.

## **III. Communications**

The CAISO requests that the following individual be placed on the official service list for this proceeding.

William H. Weaver  
Senior Counsel  
California Independent System  
Operator Corporation  
250 Outcropping Way  
Folsom, CA 95630  
Tel: (916) 608-1225  
Fax: (916) 608-7222  
E-mail: [bweaver@caiso.com](mailto:bweaver@caiso.com)

## **IV. Service**

The CAISO has served a copy of this filing on Luz Solar Partners Ltd., IX, LP, SCE, and the California Public Utilities Commission. In addition, the CAISO has posted a copy of this filing on its website.

---

<sup>2</sup> See *Electronic Tariff Filings*, Order No. 714, 124 FERC ¶ 61,270, at P 63 (2008) (“Order No. 714”) (permitting joint filers to designate one entity to file a tariff and requiring non-designated entities to submit a certificate of concurrence).

## V. Contents of Filing

Besides the transmittal letter, this filing includes the following:

1. Attachment A Certificate of Concurrence with Service Agreement No. 264 under SCE's FERC Electric Tariff, Original Volume No. 6 (the Kramer Junction 9 LGIA; and
2. Attachment B Concurrence tariff record for the Kramer Junction 9 LGIA, designated as Service Agreement No. 6695 under the CAISO tariff and as Service Agreement No. 264 under SCE's FERC Electric Tariff, Original Volume No. 6.

## VI. Conclusion

For the reasons stated herein, the CAISO respectfully requests that the Commission (a) accept the Certificate of Concurrence contained in this filing with an effective date of April 18, 2021 and (b) grant the waivers requested herein.

Respectfully submitted,

/s/ William H. Weaver

Roger E. Collanton

General Counsel

Anthony Ivancovich

Deputy General Counsel

Sidney Mannheim

Assistant General Counsel - Tariff

William H. Weaver

Senior Counsel

California Independent System

Operator Corporation

250 Outcropping Way

Folsom, CA 95630

Tel: (916) 351-4400

Fax: (916) 608-7222

[bweaver@caiso.com](mailto:bweaver@caiso.com)

Dated: April 23, 2021

## CERTIFICATE OF CONCURRENCE


This is to certify that the California Independent System Operator Corporation (“ISO”) assents and concurs in the service agreement described below, which Southern California Edison Company (“SCE”) as designated filing company, has filed in its Transmission Owner Tariff database. The ISO hereby files this Certificate of Concurrence in lieu of filing the specified service agreement.

**SCE’s Service Agreement Adopted by Reference:** Service Agreement No. 264 under SCE FERC Electric Tariff Volume No. 6

**Description of Service Agreement Adopted by Reference:** Non-conforming pro forma Large Generator Interconnection Agreement among Luz Solar Partners Ltd., IX, LP, SCE, and ISO, designated as SCE Service Agreement No. 264.

**Tariff Program/Regulated Industry:** FERC Federal Power Act (Traditional Cost of Service and Market-Based Rates)

California Independent System  
Operator Corporation  
By its duly authorized official,

DocuSigned by:  
  
92307A765E704FB...

Neil Millar

VP, Transmission Planning and  
Infrastructure Development

Dated: April 18, 2021

**California Independent System Operator Corporation  
Service Agreement No. 6695  
Large Generator Interconnection Agreement**

For the terms and conditions and rates of this service, please see the tariff document located as noted below:

<b>Joint Tariff Name/Description:</b>	Large Generator Interconnection Agreement among, Luz Solar Partners LTD, IX, LP, SCE, and California Independent System Operator Corporation, designated as SCE Service Agreement No. 264
<b>Designated Filing Company:</b>	Southern California Edison Company
<b>Designated Filing Utility Tariff Program:</b>	Transmission Owner Tariff (Traditional Cost of Service and Market-Based Rates)
<b>Designated Filing Utility Tariff Record Adopted by Reference (Tariff Record Description/Tariff Record Title):</b>	SA No. 264, Luz Solar Partners LTD., IX, LP LGIA, and all tariff records for which the designated tariff record is a direct or indirect parent record