

August 15, 2017

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 Large
Generator Interconnection Agreement Submitted in
Docket No. ER17-1699-000**

Docket No. ER17-_____-000

Dear Secretary Bose:

The California Independent System Operator Corporation (“CAISO”) hereby submits for filing a Certificate of Concurrence with respect to the unexecuted Large Generator Interconnection Agreement (“LGIA”) among Regents of the University of California (“UC Regents”), Pacific Gas and Electric Company (“PG&E”), and the CAISO (“UC Regents LGIA”).¹

I. Overview and Designated Filer

The UC Regents LGIA was filed with the Commission on May 26, 2017, as an unexecuted conforming *pro forma* LGIA by PG&E as the Participating Transmission Owner and a party to the LGIA, as a PG&E service agreement.² The filing concerned a dispute by the UC Regents regarding the *pro forma* language in Article 18 to the UC Regents LGIA.

The CAISO filed intervenor comments on June 16, 2017 in support of PG&E’s argument that the UC Regent’s proposed changes in the indemnity language in Article 18 of the LGIA are not superior to the *pro forma* language and

¹ 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. Capitalized terms not otherwise defined herein have the meanings set forth in the CAISO tariff, and references to specific sections, articles, and appendices are references to sections, articles, and appendices in the current CAISO tariff and revised or proposed in this filing, unless otherwise indicated.

² The UC Regents LGIA is designated as Service Agreement No. 344 under PG&E’s Transmission Owner Tariff, FERC Electric Tariff Volume No. 5.

should be rejected. The Commission accepted the LGIA for filing via letter order on July 20, 2017.³

Rather than filing a duplicate version of the UC Regents LGIA under the CAISO tariff, the CAISO is submitting a concurrence tariff record that is attached to the instant filing. The concurrence tariff record is designated with the same service agreement number as PG&E's service agreement number – Service Agreement No. 344.

PG&E serves as the “designated filer” as to the UC Regents LGIA pursuant to the Joint Tariff Filing procedures outlined in Order No. 714.⁴

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 July 27, 2017 for its Certificates of Concurrence, consistent with the July 27, 2017 effective date that PG&E requested in its 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

Pursuant to Rule 203(b) of the Commission's Rules of Practice and Procedure,⁵ the CAISO requests that the following individuals be placed on the official service list for this proceeding:

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³ Commission Letter Order, Docket No. ER17-1669-000 (July 20, 2017), accepting the UC Regents LGIA, effective July 27, 2017.

⁴ 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).

⁵ 18 C.F.R. § 385.203(b).

IV. Service

The CAISO has served a copy of this filing on UC Regents, PG&E, the service list for PG&E's filing, and the California Public Utilities Commission. In addition, the CAISO has posted a copy of this filing on its website.

V. Contents of Filing

The following attachments, in addition to this transmittal letter, are provided with the instant filing:

1. Attachment A – Certificate of Concurrence with Service Agreement No. 344 under PG&E's Transmission Owner Tariff, FERC Electric Tariff Volume No. 5 (the UC Regents LGIA); and
2. Attachment B – Concurrence tariff record for the UC Regents LGIA, designated as Service Agreement No. 4222 under the CAISO Non-Conforming Service Agreements tariff and as Service Agreement No. 344 under PG&E's Transmission Owner Tariff, FERC Electric Tariff Volume No. 5.

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 July 27, 2017 and (b) grant the waivers requested herein.

Respectfully submitted,

By: /s/ William H. Weaver

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Attachment A – Certificate of Concurrence

Service Agreement No. 344 Under PG&E's Transmission Owner Tariff

FERC Electric Tariff Volume No. 5

California Independent System Operator Corporation

CERTIFICATE OF CONCURRENCE

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

PG&E’s Service Agreement Adopted by Reference: Service Agreement No. 344 under PG&E FERC Electric Tariff Volume No. 5

Description of Service Agreement Adopted by Reference: Large Generator Interconnection Agreement among The Regents of the University of California, PG&E, and CAISO, designated as PG&E Service Agreement No. 344

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:

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Keith E. Casey
Vice President, Market and
Infrastructure Development

Dated: August 10, 2017

Attachment B – Clean Tariff Record

Service Agreement No. 344 Under PG&E's Transmission Owner Tariff

FERC Electric Tariff Volume No. 5

California Independent System Operator Corporation

California Independent System Operator Corporation
Service Agreement No. 4222
Large Generator Interconnection Agreement

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

Joint Tariff Name/Description:	Large Generator Interconnection Agreement for the Berkeley Cogeneration Facility, designated as PG&E Service Agreement No. 344.
Designated Filing Company:	Pacific Gas and Electric Company
Designated Filing Utility Tariff Title:	Transmission Owner Tariff
Designated Filing Utility Tariff Program:	FERC Federal Power Act (Traditional Cost of Service and Market-Based Rates)
Designated Filing Utility Tariff Record Adopted by Reference (Tariff Record Description/Tariff Record Title):	LGIA, Service Agreement No. 344, and all tariff records for which the designated tariff record is a direct or indirect parent record