

August 19, 2020

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. ER20-2624-000**

Docket No. ER20-____-000

Dear Secretary Bose:

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

I. Overview and Designated Filer

On August 6, 2020, PG&E submitted the Prospect LGIA in Docket No. ER20-2624 -000, with a requested effective date of October 7, 2020. In that filing, PG&E explained that changes to the CAISO *pro forma* LGIA were made to eliminate unnecessary accounting transactions within PG&E and allow PG&E to account for construction expenditures in accordance with the FERC Uniform System of Accounts. The Prospect LGIA deviates from the CAISO *pro forma* LGIA, as explained in PG&E’s August 6, 2020 filing.

Rather than filing a duplicate version of the Prospect 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. 6197.

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.

PG&E serves as the “designated filer” as to the Prospect LGIA pursuant to the Joint Tariff Filing procedures outlined in Order No. 714.² As the Participating Transmission Owner and Interconnection Customer to the LGIA, PG&E filed the service agreement under PG&E’s FERC Electric Tariff, Original Volume No. 5 and designated it as Service Agreement No. 395.

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 October 7, 2020 for its Certificate of Concurrence for the Prospect LGIA, consistent with the October 7, 2020 effective date that PG&E requested in its August 6, 2020 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
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IV. Service

The CAISO has served a copy of this filing on PG&E, and the California Public Utilities Commission. In addition, the CAISO has posted a copy of this filing on its website.

V. Contents of Filing

This filing includes the following:

² 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).

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1. This transmittal letter;
2. Attachment A - Certificate of Concurrence with Service Agreement No. 395 under PG&E's FERC Electric Tariff, Original Volume No. 5 (the Prospect LGIA); and
3. Attachment B - Concurrence tariff record for the Prospect LGIA, designated as Service Agreement No. 6197 under the CAISO tariff and as Service Agreement No. 395 under PG&E's FERC Electric Tariff, Original 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 October 7, 2020 and (b) grant the waivers requested herein.

Respectfully submitted,

/s/ William H. Weaver

William H. Weaver

Senior Counsel

California Independent System

Operator Corporation

250 Outcropping Way

Folsom, CA 95630

Attachment A – Executed Certificate of Concurrence
Large Generator Interconnection Agreement among PG&E and CAISO
California Independent System Operator Corporation
August 19, 2020

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 Pacific Gas and Electric Company ("PG&E") 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.

PG&E's Service Agreement Adopted by Reference: Service Agreement No. 395 under PG&E FERC Electric Tariff Volume No. 5

Description of Service Agreement Adopted by Reference: Non-conforming *pro forma* Large Generator Interconnection Agreement among PG&E and the ISO, designated as PG&E Service Agreement No. 395

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:

Neil Millar

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Neil Millar

VP, Transmission Planning and
Infrastructure Development

Dated: July 10 , 2020

Attachment B – Clean Concurrence Tariff Record
Large Generator Interconnection Agreement among PG&E and CAISO
California Independent System Operator Corporation
August 19, 2020

**California Independent System Operator Corporation
Service Agreement No. 6197
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 among PG&E and California Independent System Operator Corporation, designated as PG&E Service Agreement No. 395
Designated Filing Company:	Pacific Gas and Electric Company
Designated Filing Utility Tariff Program:	Transmission Owner Tariff and Service Agreements (Traditional Cost of Service and Market-Based Rates)
Designated Filing Utility Tariff Record Adopted by Reference (Tariff Record Description/Tariff Record Title):	TO Tariff, SA 395, PG&E Prospect Energy Storage LGIA, and all tariff records for which the designated tariff record is a direct or indirect parent record