



December 3, 2015

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 Small Generator
Interconnection Agreement Submitted in Docket No. ER16-443-000**

Docket No. ER16-____-000

Dear Secretary Bose:

The California Independent System Operator Corporation (“CAISO”) hereby submits for filing a Certificate of Concurrence with respect to the Small Generator Interconnection Agreement (“SGIA”) among Solar Star California XLIV, LLC and California Department of Water Resources (“Interconnection Customer”), Southern California Edison Company (“SCE”), and the CAISO (“Pearblossom SGIA”).¹

I. Overview and Designated Filer

On December 1, 2015, SCE submitted the Pearblossom SGIA in Docket No. ER16-443-000, with a requested effective date of December 2, 2015. In that filing, SCE explained that the Interconnection Customer submitted a request to the CAISO pursuant to the CAISO Tariff Generator Interconnection and Deliverability Allocation Procedures to interconnect a proposed 9.5 net MW (10 gross MW) solar photovoltaic generating facility named the Pearblossom Solar Project (“Project”), to be located in Pearblossom, California, and transmit energy to the CAISO controlled grid. Interconnection Customer proposes to interconnect to SCE’s Vincent Substation at the 220 kV bus by utilizing the existing Pearblossom-Vincent 220kV transmission line. Currently, the Pearblossom-Vincent 220kV transmission line is solely used to interconnect CDWR’s existing Pearblossom Pumping Plant.¹ SCE owns approximately 13.1 miles of the Pearblossom-Vincent 220kV transmission line outside of CDWR’s property line, and CDWR owns the portion of the line that is located on its property. The Interconnection Customer proposes to interconnect the Project to the portion of the line

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.

owned by CDWR. The Interconnection Customer proposes a commercial operation date of December 16, 2016 for the Project. Because of the Interconnection Customer's unique nature as a state entity, the Pearblossom SGIA deviates from the CAISO *pro forma* SGIA, as explained in SCE's December 1, 2015 filing.

Rather than filing a duplicate version of the Pearblossom SGIA 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. 3480.

SCE serves as the "designated filer" as to the Pearblossom SGIA pursuant to the Joint Tariff Filing procedures outlined in Order No. 714.² As the Participating Transmission Owner and a party to the SGIA, SCE filed the service agreement under SCE's FERC Electric Tariff, Original Volume No. 6 and designated it as Service Agreement No. 117.

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 December 2, 2015 for its Certificate of Concurrence for the Pearblossom SGIA, consistent with the December 2, 2015 effective date that SCE requested in its December 1, 2015 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.

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Counsel
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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).

IV. Service

The CAISO has served a copy of this filing on Solar Star California XLIV, LLC and California Department of Water Resources, SCE, 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:

1. This transmittal letter;
2. Attachment A - Certificate of Concurrence with Service Agreement No. 117 under SCE's FERC Electric Tariff, Original Volume No. 6 (the Pearblossom SGIA); and
3. Attachment B - Concurrence tariff record for the Pearblossom SGIA, designated as Service Agreement No. 3480 under the CAISO tariff and as Service Agreement No. 117 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 December 2, 2015 and (b) grant the waivers requested herein.

Respectfully submitted,

/s/ William H. Weaver
William H. Weaver
Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630

Attachment A

**Certificate of Concurrence with
Service Agreement No. 117 under SCE's FERC Electric Tariff,
Original Volume No. 6 (the Pearblossom SGIA)**

California Independent System Operator Corporation

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. 117 under SCE FERC Electric Tariff Volume No. 6

Description of Service Agreement Adopted by Reference: Small Generator Interconnection Agreement among Solar Star California XLIV, LLC, California Department of Water Resources, SCE, and ISO, designated as SCE Service Agreement No. 117

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:

Keith Casey

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Keith E. Casey

Dated: November 18, 2015

Attachment B

**Concurrence tariff record for the Pearblossom SGIA,
designated as Service Agreement No. 3480 under the CAISO tariff, and as
Service Agreement No. 117 under SCE's FERC Electric Tariff, Original Volume No. 6**

California Independent System Operator Corporation

California Independent System Operator Corporation
Service Agreement No. 3480
Small 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:	Small Generator Interconnection Agreement among Solar Star California XLIV, LLC, California Department of Water Resources, Southern California Edison (SCE) and the California Independent System Operator Corporation, designated as SCE Service Agreement No. 117.
Designated Filing Company:	Southern California Edison 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):	SGIA, Service Agreement No. 117, and all tariff records for which the designated tariff record is a direct or indirect parent record