

May 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 the Affected
Participating Transmission Owner Upgrade Facilities Agreement
Submitted in Docket No. ER20-1555**

Docket No. ER20-____

Dear Secretary Bose:

The California Independent System Operator Corporation (“CAISO”) hereby submits for filing a Certificate of Concurrence with respect to the Affected Participating Transmission Owner Upgrade Facilities Agreement (“UFA”) among Atlas Solar, LLC (“Atlas Solar”), Southern California Edison Company (“SCE”), and the CAISO (“Atlas UFA”).¹

I. Overview and Designated Filer

On April 13, 2020, SCE submitted the Atlas UFA in Docket No. ER20-1555, with a requested effective date of April 14, 2020. In that filing, SCE explained that the non-*pro forma* UFA specifies the terms and conditions pursuant to which SCE will design, procure, construct, own, operate and maintain the necessary facilities and upgrades to the Affected Participating TO’s transmission system, which is under the CAISO’s operational control, in connection with interconnecting the Project to the transmission system of the Interconnecting Participating TO. Such facilities are the Affected Participating TO’s Interconnection Facilities and the Affected Participating TO’s Reliability Network Upgrades, described in Sections 1(b) and 2(b)(ii) of Appendix A to the UFA, respectively.

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.

SCE is the “designated filer” as to the Atlas UFA pursuant to the Joint Tariff Filing procedures outlined in Order No. 714.² As the Participating Transmission Owner and a party to the UFA, SCE filed the service agreement under SCE’s FERC Electric Tariff, Original Volume No. 6 and designated it as Service Agreement No. 242.

Rather than filing a duplicate version of the Atlas UFA 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. 6058.

II. Proposed Effective Date and Request for Waiver

The CAISO respectfully requests any waiver of the Commission’s filing regulations necessary to establish an effective date of April 14, 2020 for its Certificate of Concurrence for the Atlas UFA, consistent with the April 14, 2020 effective date that SCE requested in its April 13, 2020 filing.

III. Communications

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

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250 Outcropping Way
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IV. Service

The CAISO has served a copy of this filing on Atlas Solar, 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:

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).

1. This transmittal letter;
2. Attachment A - Certificate of Concurrence with Service Agreement No. 242 under SCE's FERC Electric Tariff, Original Volume No. 6 (the Atlas UFA); and
3. Attachment B - Concurrence tariff record for the Atlas UFA, designated as Service Agreement No. 6058 under the CAISO tariff and as Service Agreement No. 242 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 14, 2020 and (b) grant the waivers requested herein.

Respectfully submitted,

By: /s/ William H. Weaver

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Counsel for the California Independent
System Operator Corporation

Dated: May 19, 2020

Attachment A – Executed Certificate of Concurrence

**Affected Participating Transmission Owner Upgrade Facilities Agreement among
Atlas Solar, LLC, Southern California Edison Co., and CAISO**

California Independent System Operator Corporation

May 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 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. 242 under SCE FERC Electric Tariff Volume No. 6

Description of Service Agreement Adopted by Reference: Affected Participating Transmission Owner Upgrade Facilities Agreement among Atlas Solar, LLC, SCE, and ISO, designated as SCE Service Agreement No. 242

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
0326FA482E464EB...

Neil Millar

VP, Transmission Planning and
Infrastructure Development

Dated: May 15, 2020

Attachment B – Clean Concurrence Tariff Record

**Affected Participating Transmission Owner Upgrade Facilities Agreement among
Atlas Solar, LLC, Southern California Edison Co., and CAISO**

California Independent System Operator Corporation

May 19, 2020

**California Independent System Operator Corporation
Service Agreement No. 6058
Upgrade Facilities Agreement**

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

Joint Tariff Name/Description:	Affected Participating Transmission Owner Upgrade Facilities Agreement (UFA) among Atlas Solar, LLC and Southern California Edison Company and California Independent System Operator Corporation, designated as SCE Service Agreement No. 242
Designated Filing Company:	Southern California Edison Company
Designated Filing Utility Tariff Program:	Transmission Owner Tariff (Traditional Cost of Service and Market-Based Rates)
Designated Filing Utility Tariff Record Adopted by Reference (Tariff Record Description/Tariff Record Title):	SA No. 242, Atlas Solar, LLC UFA, and all tariff records for which the designated tariff record is a direct or indirect parent record