



California Independent  
System Operator Corporation

November 4, 2014

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 Certificates of Concurrence Relating to Large Generator  
Interconnection Agreements Submitted in Docket No. ER15-227-000**

**Docket No. ER15-\_\_\_\_-000**

Dear Secretary Bose:

The California Independent System Operator Corporation (“CAISO”) hereby submits for filing two Certificates of Concurrence with respect to the non-conforming Large Generator Interconnection Agreements (“LGIAs”) among the State of California Department of Water Resources State Water Project (“CDWR”), Pacific Gas and Electric Company (“PG&E”), and the CAISO (“Oroville Facilities and San Luis LGIAs”).<sup>1</sup>

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

On October 29, 2014, PG&E submitted the Oroville Facilities and San Luis LGIAs in Docket No. ER15-227-000, with a requested effective date of January 1, 2015. In that filing, PG&E explained that these agreements, among others, provide for the continued interconnection of CDWR’s generation to PG&E’s transmission system from the soon-to-be-terminated 1982 Comprehensive Agreement between CDWR and PG&E. PG&E’s filing is pending before the Commission.

Rather than filing a duplicate version of the Oroville Facilities and San Luis LGIAs under the CAISO Tariff, the CAISO is submitting concurrence tariff records. The concurrence tariff records are designated under the CAISO Tariff as Service Agreement Nos. 3213 and 3214, respectively.

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<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.

PG&E serves as the “designated filer” as to the Oroville Facilities and San Luis LGIAs 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 LGIAs, PG&E filed the service agreements under PG&E’s FERC Electric Tariff, Original Volume No. 5 and designated them as Service Agreement Nos. 273 and 274, respectively.

## **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 January 1, 2015 for its Certificates of Concurrence for Oroville Facilities and San Luis LGIAs, consistent with the January 1, 2015 effective date that PG&E requested in its October 29, 2014 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  
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 CDWR, 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:

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<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).

1. This transmittal letter;
2. Attachment A - Certificates of Concurrence with Service Agreement Nos. 273 and 274 under PG&E's FERC Electric Tariff, Original Volume No. 5 (the Oroville Facilities and San Luis LGIAs); and
3. Attachment B - Concurrence tariff records for the Oroville Facilities and San Luis LGIAs, designated as Service Agreement Nos. 3213 and 3214, respectively, under the CAISO Tariff and as Service Agreement Nos. 273 and 274 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 Certificates of Concurrence contained in this filing with an effective date of January 1, 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 – Certificates of Concurrence**

**Filing of Certificates of Concurrence Relating to Large Generator Interconnection Agreements**

**Submitted in Docket No. ER15-227-000**

**Between the State of California Department of Water Resources State Water Project,  
Pacific Gas and Electric Company, and 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 & 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. 273 under PG&E FERC Electric Tariff Volume No. 5

**Description of Service Agreement Adopted by Reference:** Standard Large Generator Interconnection Agreement among the California Department of Water Resources, PG&E, and CAISO, designated as PG&E Service Agreement No. 273.

**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:

  
FED7FCA7283E48C

Keith E. Casey

Dated: October 23, 2014

## 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 & 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. 274 under PG&E FERC Electric Tariff Volume No. 5

**Description of Service Agreement Adopted by Reference:** Standard Large Generator Interconnection Agreement among the California Department of Water Resources, PG&E, and CAISO, designated as PG&E Service Agreement No. 274.

**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:  
  
FED7FCA7283E48C

Keith E. Casey

Dated: October 23, 2014

**Attachment B – Concurrence Tariff Records**

**Filing of Certificates of Concurrence Relating to Large Generator Interconnection Agreements**

**Submitted in Docket No. ER15-227-000**

**Between the State of California Department of Water Resources State Water Project,  
Pacific Gas and Electric Company, and California Independent System Operator Corporation**

**California Independent System Operator Corporation**  
**Service Agreement No. 3213**  
**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 the California Department of Water Resources, Pacific Gas and Electric Company (PG&E), and the California Independent System Operator Corporation, designated as PG&E Service Agreement No. 273.
<b>Designated Filing Company:</b>	Pacific Gas & Electric Company
<b>Designated Filing Utility Tariff Title:</b>	Transmission Owner Tariff
<b>Designated Filing Utility Tariff Program:</b>	FERC Federal Power Act (Traditional Cost of Service and Market-Based Rates)
<b>Designated Filing Utility Tariff Record Adopted by Reference (Tariff Record Description/Tariff Record Title):</b>	Large Generator Interconnection Agreement, Service Agreement No. 273, and all tariff records for which the designated tariff record is a direct or indirect parent record

**California Independent System Operator Corporation**  
**Service Agreement No. 3214**  
**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 the California Department of Water Resources, Pacific Gas and Electric Company (PG&E), and the California Independent System Operator Corporation, designated as PG&E Service Agreement No. 274.
<b>Designated Filing Company:</b>	Pacific Gas & Electric Company
<b>Designated Filing Utility Tariff Title:</b>	Transmission Owner Tariff
<b>Designated Filing Utility Tariff Program:</b>	FERC Federal Power Act (Traditional Cost of Service and Market-Based Rates)
<b>Designated Filing Utility Tariff Record Adopted by Reference (Tariff Record Description/Tariff Record Title):</b>	Large Generator Interconnection Agreement, Service Agreement No. 274, and all tariff records for which the designated tariff record is a direct or indirect parent record