

October 21, 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 Certificate of Concurrence Relating to Affected Participating
Transmission Owner Upgrade Facilities Agreement Submitted in Docket No.
ER14-2478-000**

Docket No. ER15-____-000

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 Copper Mountain Solar 2, LLC (“Copper Mountain”), Southern California Edison Company (“SCE”), and the CAISO (“Copper Mountain UFA”).¹

I. Overview and Designated Filer

On July 23, 2014, SCE submitted the Copper Mountain UFA in Docket No. ER14-2478-000, with a requested effective date of July 24, 2014. In that filing, SCE explained that Copper Mountain’s interconnection at the San Diego Gas & Electric Company’s Merchant 230 kV Switchyard affects SCE’s electric system such that SCE must upgrade its electric system to mitigate the impact. SCE explained that the parties developed the UFA by modifying the CAISO’s currently-effective *pro forma* Large Generator Interconnection Agreement, set forth in Appendix CC of the CAISO Tariff (“CAISO’s *pro forma* LGIA”) to provide the scope, cost, milestones and charges for the upgrades to SCE’s electric system. The Commission accepted SCE’s filing.²

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.

² Commission Letter Order, Docket No. ER14-2478-000 (September 3, 2014).

Rather than filing a duplicate version of the Copper Mountain 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. 3105.

SCE serves as the “designated filer” as to the Copper Mountain UFA pursuant to the Joint Tariff Filing procedures outlined in Order No. 714.³ 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. 160.

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 24, 2014 for its Certificate of Concurrence for the Copper Mountain UFA, consistent with the July 24 effective date that SCE requested in its July 23, 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.

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IV. Service

³ 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).

The CAISO has served a copy of this filing on Copper Mountain, 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. 160 under SCE's FERC Electric Tariff, Original Volume No. 6 (the Copper Mountain UFA);
3. Attachment B - Concurrence tariff record for the Copper Mountain UFA, designated as Service Agreement No. 3105 under the CAISO tariff and as Service Agreement No. 160 under SCE's FERC Electric Tariff, Original Volume No. 6; and

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 24, 2014 and (b) grant the waivers requested herein.

Respectfully submitted,

/s/ Sidney M. Davies
Sidney M. Davies
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William H. Weaver
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Attachment A – Certificate of Concurrence
Affected Participating Transmission Owner Upgrade Facilities Agreement
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 Southern California Edison Company (“SCE”) 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.

SCE’s Service Agreement Adopted by Reference: Service Agreement No. 160 under SCE FERC Electric Tariff Volume No. 6.

Description of Service Agreement Adopted by Reference: Affected Participating Transmission Owner Upgrade Facilities Agreement among Copper Mountain Solar 2, LLC, SCE, and CAISO, designated as SCE Service Agreement No. 160.

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 E. Casey

Dated: September 29, 2014

Attachment B – Certificate of Concurrence Tariff Record
Affected Participating Transmission Owner Upgrade Facilities Agreement
California Independent System Operator Corporation

California Independent System Operator Corporation
Service Agreement No. 3105
Affected Participating Transmission Owner 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 among Copper Mountain Solar 2, LLC, Southern California Edison Company (SCE), and the California Independent System Operator Corporation, designated as SCE Service Agreement No. 160.
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):	Affected Participating Transmission Owner Upgrade Facilities Agreement, Service Agreement No. 160, and all tariff records for which the designated tariff record is a direct or indirect parent record