



California Independent  
System Operator Corporation

August 25, 2021

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 Non-conforming Large  
Generator Interconnection Agreement Submitted in Docket No. ER21-2607**

**Docket No. ER21-\_\_-000**

Dear Secretary Bose:

The California Independent System Operator Corporation (“CAISO”) hereby submits for filing a Certificate of Concurrence with respect to the non-conforming Large Generator Interconnection Agreement (“LGIA”) among Arica Solar, LLC (“Interconnection Customer”), Southern California Edison Company (“SCE”), and the CAISO (“Sol Catcher BESS LGIA”).<sup>1</sup>

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

On August 4, 2021, SCE submitted the Sol Catcher BESS LGIA in Docket No. ER21-2607, with a requested effective date of August 5, 2021. In that filing, SCE explained that the Sol Catcher BESS LGIA contains non-conforming language related to shared Interconnection Reliability Network Upgrades. In particular, the LGIA provides that the Interconnection Customer is jointly and severally liable for the cost of the shared Interconnection Reliability Network Upgrades, as described in Section 5 (d)(ii) of Appendix A to the LGIA.

Additionally, SCE requested, pursuant to Section 35.11 (18 C.F.R. § 35.11) of the Commission’s regulations, a waiver of the 60-day prior notice requirements specified in Section 35.3 (18 C.F.R. § 35.3) and requested that the Commission assign an effective date of August 5, 2021 to the LGIA, which is the day after SCE’s filing of the Sol Catcher BESS LGIA.

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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.

Rather than filing a duplicate version of the Sol Catcher BESS 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. 6872.

SCE serves as the “designated filer” to the Sol Catcher BESS LGIA 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 LGIA, SCE filed the service agreement under SCE’s FERC Electric Tariff, Original Volume No. 6 and designated it as Service Agreement No. 272.

## **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 August 5, 2021 for its Certificate of Concurrence for the Sol Catcher BESS LGIA, consistent with the August 5, 2021 effective date that SCE requested in its August 4, 2021 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  
Folsom, CA 95630  
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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).

#### **IV. Service**

The CAISO has served a copy of this filing on Arica Solar, LLC; 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**

Besides this transmittal letter, this filing includes the following:

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|-----------------|--|
| 1. Attachment A | Certificate of Concurrence with Service Agreement No. 272 under SCE's FERC Electric Tariff, Original Volume No. 6 (Sol Catcher BESS LGIA); and   |
| 2. Attachment B | Concurrence tariff record for the Sol Catcher BESS LGIA, designated as Service Agreement No. 6872 under the CAISO tariff and as Service Agreement No. 272 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 August 5, 2021 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

Counsel for the California Independent System  
Operator Corporation

**Attachment A – Signed Certificate of Concurrence**

**LGIA – Sol Catcher BESS**

**California Independent System Operator Corporation**

**August 25, 2021**

## 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. 272 under SCE’s Transmission Owner Tariff, FERC Electric Tariff, Volume No. 6.

**Description of Service Agreement Adopted by Reference:** Non-conforming Large Generator Interconnection Agreement among Arica Solar, LLC, SCE, and the ISO, designated as Service Agreement No. 272.

**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:  
  
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Neil Millar

VP, Transmission Planning and  
Infrastructure Development

Dated: August 11, 2021

**Attachment B – Certificate of Concurrence**

**LGIA – Sol Catcher BESS**

**California Independent System Operator Corporation**

**August 25, 2021**

**California Independent System Operator Corporation  
Service Agreement No. 6872  
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 Arica Solar, LLC, Southern California Edison Company, and California Independent System Operator Corporation, designated as SCE Service Agreement No. 272
<b>Designated Filing Company:</b>	Southern California Edison Company
<b>Designated Filing Utility Tariff Program:</b>	Transmission Owner Tariff (Traditional Cost of Service and Market-Based Rates)
<b>Designated Filing Utility Tariff Record Adopted by Reference (Tariff Record Description/Tariff Record Title):</b>	SA No. 272, Sol Catcher BESS LGIA, and all tariff records for which the designated tariff record is a direct or indirect parent record