

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

<b>Pacific Gas and Electric Company</b>	)	
	)	<b>Docket No. ER18-859-000</b>
	)	

**MOTION TO INTERVENE AND COMMENTS OF  
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

The California Independent System Operator Corporation (“CAISO”) respectfully files this motion to intervene and comments in response to the February 14, 2018 request by Pacific Gas and Electric Company (“PG&E”) to waive Section 11.2 of Appendix DD to the CAISO tariff so that PG&E would not be required to post interconnection financial security to itself.<sup>1</sup> With the clarifications provided herein, the CAISO does not oppose PG&E’s request for waiver.

**I. MOTION TO INTERVENE**

Because PG&E is requesting waiver from a CAISO tariff requirement, the CAISO has a substantial and direct interest in the proceeding that no other party can adequately represent. The CAISO’s intervention is in the public interest and should be granted.

**II. COMMENTS**

Sections 11.2 and 11.3 of Appendix DD of the CAISO’s tariff require CAISO interconnection customers to post financial security instruments to the interconnecting transmission owner for the network upgrades that the participating transmission owner

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<sup>1</sup> The CAISO moves to intervene and submits these comments pursuant to Rules 212 and 214 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. §§ 385.212, 385.214 (2018).

will construct. Interconnection financial security ensures that the transmission owner is not exposed to financial risk if the interconnection customer withdraws its project and dissolves after the transmission owner has begun construction on the interconnection customer's network upgrades. Because PG&E in this case is both the interconnection customer and the transmission owner, Section 11.2 and Section 11.3 would require PG&E to provide interconnection financial security to itself. This exercise in tariff compliance would have no practical effect, and as such the CAISO does not oppose PG&E's request for waiver. The CAISO is currently examining this issue in its current Interconnection Process Enhancements stakeholder initiative to avoid the need for these waivers in the future.<sup>2</sup>

The CAISO notes that PG&E has not requested waiver of Sections 7.6 or 11.4 of Appendix DD to the CAISO tariff. These sections address the portion of interconnection financial security that is not refunded to the interconnection customer if it withdraws. Generally, non-refundable amounts are remitted to the CAISO to be re-distributed to transmission owners for still-needed network upgrade construction, or to offset transmission owners' transmission revenue requirements. The CAISO does not oppose PG&E's request for waiver because these sections will still require PG&E to remit to the CAISO any funds that would have been considered non-refundable interconnection financial security upon withdrawal had it been required to provide interconnection financial security instruments. As such, no party will be harmed by PG&E's request for

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<sup>2</sup> See <http://www.caiso.com/informed/Pages/StakeholderProcesses/InterconnectionProcessEnhancements.aspx>.

waiver even if it ultimately withdraws the interconnection requests for its generation projects.

### **III. CONCLUSION**

For the reasons discussed above, the CAISO does not oppose PG&E's request for waiver.

**By: /s/ William H. Weaver**

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Dated: March 7, 2018

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each party listed on the official service list for this proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010 (2018)).

Dated at Folsom, California on this 7<sup>th</sup> day of March, 2018.

*Is/ Anna Pascuzzo*

Anna Pascuzzo