

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

Improvements to Generator)	
Interconnection Procedures and)	Docket No. RM22-14-000
Agreements)	

**COMMENTS OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
SUPPORTING JOINT MOTION FOR EXTENSION**

The California Independent System Operator Corporation (“CAISO”) submits these comments in response to Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company’s (collectively, “IOUs”) joint motion for extension of time to submit compliance filings.¹ The CAISO fully supports the IOUs’ extension.² The IOUs have maintained their wholesale distribution access tariffs (“WDATs”) to align with the CAISO’s generator interconnection and transmission planning processes. The WDATs have numerous provisions that incorporate CAISO processes directly, and many cross-references. This alignment is unique among transmission owners, and the CAISO and IOUs have worked diligently for years to keep their tariffs aligned.

Granting the IOUs’ extension will significantly reduce the administrative burden for the Commission and stakeholders. Without it, the IOUs and the CAISO will likely require additional rounds of compliance filings and tariff revisions under Section 205 to keep the tariffs and interconnection processes aligned. By granting the IOUs’ motion, the Commission will receive compliance filings already based on the CAISO’s accepted

¹ The CAISO 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.

² The CAISO takes no position on any other motion for extension.

compliance, thereby expediting the goals Order No. 2023 promotes. The CAISO notes that it has *not* sought any extension to comply with Order No. 2023, and intends to comply with the order, as directed, by December 5, 2023. As such, the Commission and stakeholders will not face any extended delay in granting the IOUs' motion.

/s/ William H. Weaver

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Dated: October 05, 2023

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 5th day of October, 2023.

/s/ Ariana Rebanco
Ariana Rebanco