

## September 21, 2012

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 Large Generator
Interconnection Agreement Submitted in Docket No. ER12-2658-000

Docket No. ER12- -000

Dear Secretary Bose:

The California Independent System Operator Corporation ("ISO") hereby submits for filing a Certificate of Concurrence with respect to a Large Generator Interconnection Agreement ("LGIA") submitted by Pacific Gas and Electric Company ("PG&E") on September 19, 2012 in Docket No. ER12-5658-000, which PG&E designated as Service Agreement No. 210 under PG&E FERC Electric Tariff Volume No. 5.1

## I. Overview and Designated Filer

The LGIA, designated as Service Agreement No. 210 under PG&E FERC Electric Tariff Volume No. 5, is a three-party generator interconnection agreement among PG&E, the ISO, and the Tri-Dam Project, a joint venture of the South San Joaquin Irrigation District and the Oakdale Irrigation District ("Tri-Dam Project"), regarding the Tulloch Powerhouse.

The ISO submits this filing pursuant to Sections 35.1 and 131.52 of the Commission's regulations, 18 C.F.R. §§ 35.1, 131.52.

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PG&E serves as the "designated filer" as to the LGIA pursuant to the Joint Tariff Filing procedures outlined in Order No. 714.<sup>2</sup> Also, as shown in concurrence tariff records for the LGIA that are attached to the instant filing, the LGIA is designated as Service Agreement No. 2668 under the ISO tariff.

## II. Proposed Effective Date and General Request for Waivers

The ISO respectfully requests any waivers of the Commission's filing regulations necessary to establish an effective date of March 31, 2012 for its Certificate of Concurrence, consistent with the March 31 effective date that PG&E requested for the LGIA in its September 19 filing. To the extent that the enclosed materials and information do not meet the detailed filing requirements of the Commission's regulations, the ISO respectfully requests that the Commission grant any necessary waivers.

### III. Communications

The ISO requests that the following individual be placed on the official service list for this proceeding.

John C. Anders
Senior Counsel
California Independent System
Operator Corporation
250 Outcropping Way
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#### IV. Service

The ISO has served a copy of this filing on PG&E, the Tri-Dam Project, and the California Public Utilities Commission. In addition, the ISO has posted a copy of this filing on its website.

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).

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# V. Contents of Filing

This filing includes the following:

- 1. This transmittal letter;
- Certificate of Concurrence with Service Agreement No. 210 under PG&E FERC Electric Tariff Volume No. 5 (the LGIA); and
- 3. Concurrence tariff records for the LGIA, Service Agreement No. 210 under PG&E FERC Electric Tariff Volume No. 5.

### VI. Conclusion

For the reasons stated herein, the ISO respectfully requests that the Commission (a) accept the Certificate of Concurrence contained in this filing with an effective date of March 31, 2012 and (b) grant the waivers requested herein.

Respectfully submitted,

\_/s/ John C. Anders\_

John C. Anders Senior Counsel California Independent System Operator Corporation 250 Outcropping Way Folsom, CA 95630

Enclosures

#### 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 Pacific Gas and Electric Company ("PG&E") as designated filing company, has filed in its Transmission Owner Tariff and Related Service Agreements database. The ISO 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. 210 under PG&E FERC Electric Tariff Volume No. 5

**Description of Service Agreement Adopted by Reference:** Large Generator Interconnection Agreement for the Interconnection of the Tri-Dam Project of the South San Joaquin Irrigation District and Oakdale Irrigation District for the Tulloch Powerhouse, designated as PG&E Service Agreement No. 210

**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,

/s/ Keith E. Casey\_

Keith E. Casey

Dated: September 21, 2012

# California Independent System Operator Corporation Service Agreement No. 2668 Large Generator Interconnection Agreement

For the terms and conditions and rates of this service, please see the tariff document located as noted below:

Joint Tariff Name/Description: Large Generator Interconnection Agreement for

the Interconnection of the Tri-Dam Project of the

South San Joaquin Irrigation District and Oakdale Irrigation District for the Tulloch Powerhouse, designated as PG&E Service

Agreement No. 210.

**Designated Filing Company:** Pacific Gas and Electric Company

**Designated Filing Utility Tariff Title:** Transmission Owner Tariff and Related Service

Agreements

**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): TO Tariff, SA 210, Tri-Dam Project - Tulloch Powerhouse LGIA, and all tariff records for which the designated tariff record is a direct or

indirect parent record