

April 23, 2018

The Honorable Kimberly D. Bose Secretary Federal Energy Regulatory Commission 888 First Street, NE Washington, DC 20426

> Re: **California Independent System Operator Corporation** ER18- -000

> > **Certificate of Concurrence Relating to Affected Participating Transmission Owner Upgrade Facilities Agreement Submitted** in Docket No. ER18-996-000

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 Ares Nevada, LLC ("Interconnection Customer"), Southern California Edison Company ("SCE"), and the CAISO ("Ares Nevada UFA").1

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

On March 13, 2018, SCE submitted the Ares Nevada UFA in Docket No. ER18-996-000, with a requested effective date of March 13, 2018. In that filing, SCE explained that Interconnection Customer's interconnection at the GridLiance West Transco, LLC's Gamebird 230 kV Switchyard affects SCE's electric system and in order to mitigate that impact, SCE must upgrade its electric system. As such, the parties developed the UFA by modifying the CAISO's currentlyeffective pro forma Large Generator Interconnection Agreement, set forth in Appendix DD 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. SCE's filing is currently pending before the Commission.

Rather than filing a duplicate version of the Ares Nevada 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. 4449.

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.

Honorable Kimberly D. Bose April 23, 2018 Page 2

SCE serves as the "designated filer" as to the Ares Nevada UFA 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 UFA, SCE filed the service agreement under SCE's FERC Electric Tariff, Original Volume No. 6 and designated it as Service Agreement No. 208.

# 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 March 13, 2018, for its Certificate of Concurrence for the Ares Nevada UFA, consistent with the March 13, 2018, effective date requested by SCE in its 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

Correspondence and other communications regarding this filing should be directed to:<sup>3</sup>

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250 Outcropping Way
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Email: <u>bweaver@caiso.com</u>

# IV. Service

The CAISO has served a copy of this filing on Ares Nevada, LLC, SCE, and the California Public Utilities Commission. In addition, the CAISO 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).

<sup>&</sup>lt;sup>3</sup> 18 C.F.R. § 385.203(b)(3).

#### V. Contents of Filing

In addition to this transmittal letter, this filing includes the following attachments:

Attachment A Certificate of Concurrence with Service

Agreement No. 208 under SCE's FERC

Electric Tariff, Original Volume No. 6 (the Ares

Nevada UFA); and

Attachment B Concurrence tariff record for the Ares Nevada

UFA, designated as Service Agreement No. 4449 under the CAISO tariff and as Service Agreement No. 208 under SCE's FERC Electric Tariff, Original Volume No. 6.

#### VI. Conclusion

For the reasons stated herein, the CAISO respectfully requests that the Commission accept the Certificate of Concurrence contained in this filing with an effective date of March 13, 2018, and grant the waivers requested herein.

Respectfully submitted,

## By: /s/ William H. Weaver

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## Attachment A – Certificate of Concurrence

Certificate of Concurrence Relating to Affected Participating Transmission Owner Upgrade

Facilities Agreement Among Ares Nevada, LLC, Southern California Edison Company, and

California Independent System Operator Corporation

#### 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. 208 under SCE FERC Electric Tariff Volume No. 6

**Description of Service Agreement Adopted by Reference:** Affected Participating Transmission Owner Upgrade Facilities Agreement among Ares Nevada, LLC, SCE and the ISO, designated as SCE Service Agreement No. 208

**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:
Eric Schmitt

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Eric Schmitt

Dated: March 22, 2018

## Attachment B - Clean Tariff Record

Certificate of Concurrence Relating to Affected Participating Transmission Owner Upgrade

Facilities Agreement Among Ares Nevada, LLC, Southern California Edison Company, and

California Independent System Operator Corporation

#### California Independent System Operator Corporation Service Agreement No. 4449 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 Ares Nevada, LLC, SCE, and the CAISO, designated

as SCE Service Agreement No. 208

**Designated Filing Company:** Southern California Edison Company (SCE)

**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):

UFA, Service Agreement No. 208, and all tariff records for which the designated tariff record is a

direct or indirect parent record