

May 14, 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 Affected Participating
Transmission Owner Upgrade Facilities Agreement
Submitted in Docket No. ER21-1793**

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 Affected Participating Transmission Owner Upgrade Facilities Agreement (“UFA”) among Yellow Pine Solar, LLC (“Yellow Pine Solar”), Southern California Edison Company (“SCE”), and the CAISO (“Yellow Pine 2 UFA”).¹

I. Overview and Designated Filer

On April 29, 2021, SCE submitted the Yellow Pine 2 UFA in Docket No. ER21-1793, with a requested effective date of April 30, 2021. In that filing, SCE explained that the non-*pro forma* UFA specifies the terms and conditions pursuant to which SCE will design, procure, construct, own, operate and maintain the necessary facilities and upgrades to the Affected Participating TO’s transmission system, which is under the CAISO’s operational control, in connection with interconnecting the Project to the transmission system of the Interconnecting Participating TO. Such facilities and upgrades are the Affected Participating TO’s Reliability Network Upgrades, described in Section 3(a) of Appendix A to the UFA.

¹ 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.

SCE is the “designated filer” to the Yellow Pine 2 UFA pursuant to the Joint Tariff Filing procedures outlined in Order No. 714.² As the Affected 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. 261.

Rather than filing a duplicate version of the Yellow Pine 2 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. 6696.

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 April 30, 2021 for its Certificate of Concurrence for the Kramer Junction 9 LGIA, consistent with the April 30, 2021 effective date that SCE requested in its April 29, 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
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IV. Service

The CAISO has served a copy of this filing on Yellow Pine Solar, SCE, and the California Public Utilities Commission. In addition, the CAISO has posted a copy of this filing on its website.

² 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).

V. Contents of Filing

Besides this transmittal letter, this filing includes the following:

1. Attachment A Certificate of Concurrence with Service Agreement No. 261 under SCE's FERC Electric Tariff, Original Volume No. 6 (the Yellow Pine 2 UFA); and
2. Attachment B Concurrence tariff record for the Yellow Pine 2 UFA, designated as Service Agreement No. 6696 under the CAISO tariff and as Service Agreement No. 261 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 April 30, 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 SA No. 261

among

Yellow Pine Solar,

Southern California Edison

and

the California Independent System Operator Corporation

May 14, 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. 261 under SCE FERC Electric Tariff Volume No. 6

Description of Service Agreement Adopted by Reference: Non-conforming Upgrade Facilities Agreement (UFA) among Yellow Pine Solar, LLC, SCE, and ISO, designated as SCE Service Agreement No. 261

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:

Neil Millar

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Neil Millar

VP, Transmission Planning and
Infrastructure Development

Dated: April 30th, 2021

Attachment B – Tariff record for the Yellow Pine 2 UFA
Certificate of Concurrence among
Yellow Pine Solar,
Southern California Edison
and
the California Independent System Operator Corporation
May 14, 2021

**California Independent System Operator Corporation
Service Agreement No. 6696
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:	Affected Participating Transmission Owner Upgrade Facilities Agreement (UFA) among, Yellow Pine Solar, LLC, Southern California Edison Company, and California Independent System Operator Corporation, designated as SCE Service Agreement No. 261
Designated Filing Company:	Southern California Edison Company
Designated Filing Utility Tariff Program:	Transmission Owner Tariff (Traditional Cost of Service and Market-Based Rates)
Designated Filing Utility Tariff Record Adopted by Reference (Tariff Record Description/Tariff Record Title):	SA No. 261, Yellow Pine Solar, LLC UFA, and all tariff records for which the designated tariff record is a direct or indirect parent record