

April 16, 2019

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 Affected
Participating Transmission Owner Upgrade Facilities
Agreement Submitted in Docket No. ER19-1081-000**

Docket No. ER19-_____-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 Sunshine Valley Solar, LLC (SV), Southern California Edison Company (SCE), and the CAISO (SV UFA).¹

I. Overview and Designated Filer

On February 21, 2019, SCE submitted the SV UFA for filing with the Commission in Docket No. ER19-1081-000, with a requested effective date of February 21, 2019. In that filing, SCE explained that the 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 SV's generating unit and associated facilities to the transmission system of Valley Electric Association, Inc., the Interconnecting Participating TO. The SV UFA is not a CAISO *pro forma*, agreement.

Rather than filing a duplicate version of the SV UFA under the CAISO tariff, the CAISO is submitting a concurrence tariff record. The concurrence tariff record is designated under the CAISO tariff as Service Agreement No. 4954.

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 serves as the “designated filer” as to the SV 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 SV UFA, SCE filed the SV UFA under SCE’s FERC Electric Tariff, Original Volume No. 6 and designated it as Service Agreement No. 230.

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 February 21, 2019, for its concurrence tariff record for the SV UFA, consistent with the February 21, 2019, effective date that SCE requested in its February 21, 2019, filing, which the Commission accepted on April 8, 2019.³ 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

Pursuant to Rule 203(b)(3) of the Commission’s Rules of Practice and Procedure,⁴ the CAISO requests that the following individual be placed on the official service list to receive all communications and other communications for this proceeding:

Roger E. Collanton
General Counsel
Sidney L. Mannheim
Assistant General Counsel
William H. Weaver
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California Independent System
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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).

³ See Delegated Letter Order issued April 8, 2019, Docket No. ER19-1081-000.

⁴ 18 C.F.R. § 385.203(b)(3).

IV. Service

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

V. Contents of Filing

In addition transmittal letter, the following documents support the instant filing:

Attachment A: Executed Certificate of Concurrence with Service Agreement No. 230 under SCE's FERC Electric Tariff, Original Volume 6 (the SV UFA); and

Attachment B: Concurrence tariff record in clean format for the SV UFA, designated as Service Agreement No. 4954 under the CAISO tariff and as Service Agreement No. 230 under SCE's FERC Electric Tariff, Original Volume No. 60.

VI. Conclusion

For the reasons stated herein, the CAISO respectfully requests that the Commission accept the Certificate of Concurrence and the concurrence tariff record, with an effective date of February 21, 2019, consistent with the SV UFA effective date. Additionally, the CAISO respectfully requests that the Commission grant the necessary waivers requested herein.

Respectfully submitted,

/s/ William H. Weaver

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Assistant General Counsel
William H. Weaver
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Attachment A – Executed Certificate of Concurrence
Affected Participating Transmission Owner Upgrade Facilities Agreement
California Independent System Operator Corporation

CERTIFICATE OF CONCURRENCE


This is to certify that the California Independent System Operator Corporation (“CAISO”) 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 CAISO hereby files this Certificate of Concurrence in lieu of filing the specified service agreement.

SCE’s Service Agreement Adopted by Reference: Service Agreement No. 230 under SCE FERC Electric Tariff Volume No. 6

Description of Service Agreement Adopted by Reference: Affected Participating Transmission Owner Upgrade Facilitates Agreement among Sunshine Valley Solar, LLC, SCE, and CAISO, designated as SCE Service Agreement No. 230

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:

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Keith E. Casey

Dated: March 20, 2019

Attachment B – Clean Tariff

Affected Participating Transmission Owner Upgrade Facilities Agreement

California Independent System Operator Corporation

**California Independent System Operator Corporation
Service Agreement No. 4954
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 (UFA) among Sunshine Valley Solar, LLC and Southern California Edison Company and California Independent System Operator Corporation, designated as SCE Service Agreement No. 230
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):	UFA, Service Agreement No. 230, and all tariff records for which the designated tariff record is a direct or indirect parent record