



California Independent  
System Operator Corporation

August 16, 2024

The Honorable Debbie-Anne A. Reese  
Acting 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 Non-conforming  
Large Generator Interconnection Agreement Submitted in Docket No.  
ER24-2543-000**

**Docket No. ER24-\_\_\_\_-000**

Dear Secretary Reese:

The California Independent System Operator Corporation ("CAISO") hereby submits for filing a Certificate of Concurrence with respect to the non-conforming Large Generator Interconnection Agreement among Elisabeth Solar, LLC, San Diego Gas & Electric Company ("SDG&E"), Imperial Irrigation District ("IID"), Arizona Public Service Company ("APS") and the CAISO, (the "LGIA").<sup>1</sup>

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

On July 18, 2024, APS submitted the LGIA in Docket No. ER24-2543-000, with a requested effective date of June 18, 2024. In that filing, APS explained that the LGIA includes non-conforming language to integrate the conforming elements of the CAISO's Commission approved *pro forma* Large Generator Interconnection Agreement. This integration was made to facilitate the project interconnecting 350 MW of solar PV generation and Battery Energy Storage System into both the APS and CAISO systems at the Hoodoo Wash 500kV Switchyard (co-owned by APS, SDG&E, and IID).

Additionally, APS requested, pursuant to Section 35.11 (18 C.F.R. § 35.11) of the Commission's regulations, a waiver of the 60-day prior notice requirements specified in Section 35.3 (18 C.F.R. § 35.3) and requested that the

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<sup>1</sup> 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.

Commission assign an effective date of June 18, 2024 to the LGIA, which is thirty days prior to APS's filing of the LGIA.

Rather than filing a duplicate version of the LGIA 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. 8346.

APS serves as the "designated filer" to the LGIA pursuant to the Joint Tariff Filing procedures outlined in Order No. 714.<sup>2</sup> APS filed the service agreement under APS's Open Access Transmission Tariff ("OATT") and designated it as Service Agreement No. 422.

## **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 June 18, 2024 for its Certificate of Concurrence for the LGIA, consistent with the June 18, 2024 effective date that APS requested in its July 18, 2024 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  
Assistant General Counsel  
California Independent System  
Operator Corporation  
250 Outcropping Way  
Folsom, CA 95630  
Tel: (916) 608-1225  
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<sup>2</sup> 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).

#### **IV. Service**

The CAISO has served a copy of this filing on Elisabeth Solar, LLC, and SDG&E, IID, APS, and the California Public Utilities Commission. In addition, the CAISO has posted a copy of this filing on its website.

#### **V. Contents of Filing**

Besides this transmittal letter, this filing includes the following:

- |                 |  |
|-----------------|--|
| 1. Attachment A | Certificate of Concurrence with Service Agreement No. 422 under APS's OATT (LGIA); and   |
| 2. Attachment B | Concurrence tariff record for the LGIA, designated as Service Agreement No. 8346 under the CAISO tariff and as Service Agreement No. 422 under APS's OATT. |

#### **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 June 18, 2024 and (b) grant the waivers requested herein.

Respectfully submitted,

/s/ William H. Weaver

William H. Weaver

Assistant General Counsel  
California Independent System  
Operator Corporation  
250 Outcropping Way  
Folsom, CA 95630

Counsel for the California Independent System  
Operator Corporation

**Attachment A – Certificate of Concurrence**

**Certificate of Concurrence – Elisabeth Solar**

**California Independent System Operator Corporation**

**August 16, 2024**

## CERTIFICATE OF CONCURRENCE

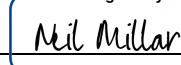
This is to certify that the California Independent System Operator Corporation ("CAISO") assents and concurs in the service agreement described below, which Arizona Public Service Company ("APS") as designated filing company, has filed in its Open Access Transmission Tariff ("OATT") database. The CAISO hereby files this Certificate of Concurrence in lieu of filing the specified service agreement.

**APS's Service Agreement Adopted by Reference:** Service Agreement No. 422 under APS's OATT.

**Description of Service Agreement Adopted by Reference:** Non-conforming Large Generator Interconnection Agreement among, Elisabeth Solar, LLC, San Diego Gas & Electric Company, Imperial Irrigation District, APS and the CAISO, designated as APS Service Agreement No. 422.

**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:  
  
9236FA183EA64FB...  
Neil Millar VP, Transmission  
Planning and Infrastructure  
Development

Dated: August 2, 2024

**Attachment B – Tariff Record**

**Certificate of Concurrence – Elisabeth Solar**

**California Independent System Operator Corporation**

**August 16, 2024**

**California Independent System Operator Corporation  
Service Agreement No. 7004  
Large Generator Interconnection Agreement**

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

<b>Designated Filing Company:</b>	Arizona Public Service Company
<b>Designated Filing Utility Tariff Program:</b>	Electric Traditional Cost of Service and Market-Based Rates
<b>Designated Filing Company Tariff Title:</b>	FERC Electric Tariff, Volume No. 2
<b>Designated Filing Utility Tariff Record Adopted by Reference:</b>	Service Agreement No. 422, LGIA with Elisabeth Solar