

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Pacific Gas & Electric Co.

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Docket No. ER24-2705

**COMMENTS OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

The California Independent System Operator Corporation (“CAISO”) submits these comments in response to Pacific Gas and Electric Company’s (“PG&E”) submission of an unexecuted generator interconnection agreement (“GIA”) among the CAISO, PG&E, and the interconnection customer, Agua Amarga Wind, LLC (“Agua Amarga”).¹ The CAISO fully supports approval of the GIA as filed by PG&E. Agua Amarga has consistently delayed negotiating or executing its GIA, or to agree in the GIA to submit a timely third interconnection financial security posting. The CAISO tariff requires the third interconnection financial security posting “[a]fter the second posting for a Queue Cluster has been made but no later than the start of Construction Activities² for Network Upgrades or Participating TO’s Interconnection Facilities on behalf of the Interconnection Customer.”³ This requirement provides the final financing necessary for the transmission owner to begin procurement, permitting, engineering, and construction of the interconnection customer’s network upgrades, including any network upgrades

¹ The CAISO submits these comments pursuant to Rules 212 and 214 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. §§ 385.212, 385.214.

² Defined as “Actions by a Participating TO that result in irrevocable financial commitments for the purchase of major electrical equipment or land for Participating TO’s Interconnection Facilities or Network Upgrades assigned to the Interconnection Customer that occur after receipt of all appropriate governmental approvals needed for the Participating TO’s Interconnection Facilities or Network Upgrades.” Appendix A to the CAISO tariff.

³ Section 11.3.2 of Appendix DD to the CAISO tariff.

other interconnection customers share or depend on. PG&E's submission of the unexecuted GIA and proposed deadline for the third interconnection financial security posting are consistent with the CAISO's tariff requirements. The Commission should approve the GIA as filed by PG&E.

/s/ William H. Weaver

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Dated: August 26, 2024

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each party listed on the official service list for this proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010 (2018)).

Dated at Folsom, California on this 26th day of August, 2024.

/s/ Ariana Rebancos

Ariana Rebancos