



January 14, 2025

The Honorable Debbie-Anne A. Reese
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 Large Generator
Interconnection Agreement Submitted in Docket No. ER25-585-000**

Docket No. ER25-____-000

Dear Secretary Reese:

The California Independent System Operator Corporation (CAISO) hereby submits for filing a Certificate of Concurrence with respect to the Large Generator Interconnection Agreement among Pacific Gas and Electric Company (PG&E), Metcalf Energy Center, LLC (Metcalf), and the CAISO, (the First Amended LGIA).¹

I. Overview and Designated Filer

On November 27, 2024, PG&E submitted the LGIA in Docket No. ER25-585-000, with a requested effective date of November 29, 2024. In that filing, PG&E explained that the Parties have agreed upon all terms and conditions in the replacement agreement except for the updated monthly Cost of Ownership rate. To ensure continued service, PG&E is filing this unexecuted replacement agreement to conform with the date that TO SA No. 28 terminates.

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 CAISO tariff as Service Agreement No. 8545.

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.

PG&E serves as the “designated filer” to the LGIA pursuant to the Joint Tariff Filing procedures outlined in Order No. 714.² PG&E filed the service agreement under PG&E’s Transmission Owner (TO) Tariff and Service Agreements and designated it as Service Agreement No. 489.

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 November 29, 2024 for its Certificate of Concurrence for the LGIA, consistent with the effective date that PG&E requested in its November 27, 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

Under Rule 203(b)(3),³ 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
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250 Outcropping Way
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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 18 C.F.R. § 385.203(b)(3).

IV. Service

The CAISO has served a copy of this filing on PG&E, Metcalf, all parties listed in the original docket, ER25-585-000, 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. 489 under PG&E's TO (LGIA); and |
| 2. Attachment B | Concurrence tariff record for the LGIA, designated as Service Agreement No. 8545 under the CAISO tariff and as Service Agreement No. 489 under PG&E's TO (LGIA). |

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 November 29, 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 – Metcalf

California Independent System Operator Corporation

January 14, 2025

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 Pacific Gas and Electric Company (“PG&E”) 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.

PG&E’s Service Agreement Adopted by Reference: Service Agreement No. 489 under PG&E’s Transmission Owner Tariff, FERC Electric Tariff, Volume No. 6.

Description of Service Agreement Adopted by Reference: Non-conforming Large Generator Interconnection Agreement among Metcalf Energy Center, LLC, PG&E, and the ISO, designated as Service Agreement No. 8545.

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,

Signed by:

Neil Millar

032650182506458

Neil Millar

VP, Transmission Planning and
Infrastructure Development

Dated: December 18, 2024

Attachment B – Tariff Record

Certificate of Concurrence – Metcalf

California Independent System Operator Corporation

January 14, 2025

**California Independent System Operator Corporation
Service Agreement No. 8545
Large Generator Interconnection Agreement**

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

Designated Filing Company:	Pacific Gas and Electric Company
Designated Filing Utility Tariff Program:	Electric Traditional Cost of Service and Market-Based Rates
Designated Filing Company Tariff Title:	Transmission Owner Tariff and Service Agreements
Designated Filing Utility Tariff Record Adopted by Reference:	TO Tariff, SA 489, Metcalf Energy Center, and all subsequent tariff records