



California Independent  
System Operator Corporation

January 23, 2026

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 Non-conforming  
Large Generator Interconnection Agreement Submitted in Docket No.  
ER25-2784-000**

**Docket No. ER26-\_\_\_\_-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 TransWest Express, LLC (TransWest), Power Company of Wyoming, LLC (PCW), and the CAISO (the LGIA).<sup>1</sup>

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

On July 3, 2025, TransWest submitted the LGIA in Docket No. ER25-2784-000, with a requested effective date of September 2, 2025. In that filing, TransWest explained that the LGIA includes non-conforming language including (1) changes necessitated by the implementation of the subscriber participating transmission owner model accepted by the Commission in Docket No. ER23-2917-000; (2) changes to reflect the commercial relationship between TransWest and PCW; and (3) miscellaneous clarifications and technical corrections. On November 4, 2025, the Commission accepted the LGIA via letter order, effective September 2, 2025.

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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.

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. 8734.

TransWest serves as the “designated filer” to the LGIA pursuant to the Joint Tariff Filing procedures outlined in Order No. 714.<sup>2</sup> TransWest filed the service agreement under TransWest’s Open Access Transmission Tariff (“OATT”) and designated it as Service Agreement No. 1.

## **II. Proposed Effective Date and General Request for Waivers**

Consistent with prior Certificates of Concurrence, the CAISO respectfully requests any waivers of the Commission’s filing regulations necessary to establish an effective date of September 2, 2025, for its Certificate of Concurrence for the LGIA. This will give the certificate an effective date consistent with the September 2, 2025, effective date that TransWest requested in its July 3, 2025 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  
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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 TransWest, PCW, 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. 1 under TransWest's OATT (LGIA); and  |
| 2. Attachment B | Concurrence tariff record for the LGIA, designated as Service Agreement No. 8734 under the CAISO tariff and as Service Agreement No.1 under TransWest'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 September 2, 2025, 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 – TransWest**

**California Independent System Operator Corporation**

**January 23, 2026**

**California Independent System Operator Corporation**  
**Service Agreement No. 8734**  
**Large Generator Interconnection Agreement**

**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 TransWest Express LLC (“TransWest”) 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.

**TransWest’s Service Agreement Adopted by Reference:** Service Agreement No. 1 under TransWest’s FERC Electric Tariff Volume No. 1

**Description of Service Agreement Adopted by Reference:** Non-conforming Large Generator Interconnection Agreement among TransWest Express LLC, Power Company of Wyoming, LLC (PCW), and the CAISO, designated as Service Agreement No. 1.

**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

Dated: 1/21/2026

**Attachment B – Tariff Record**

**Certificate of Concurrence – TransWest**

**California Independent System Operator Corporation**

**January 23, 2026**

**California Independent System Operator Corporation  
Service Agreement No. 8734  
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>	TransWest Express LLC
<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. 1
<b>Designated Filing Utility Tariff Record Adopted by Reference:</b>	Service Agreement No. 1, LGIA - TransWest Express LLC, PCW & CAISO