

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

San Diego Gas & Electric Co.)	
)	Docket No. ER25-1480-000
)	

**MOTION TO INTERVENE AND COMMENTS OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

The California Independent System Operator Corporation (“CAISO”) respectfully files this motion to intervene and comments in support of the February 28, 2025 request by San Diego Gas & Electric Company (“SDG&E”) to waive Sections 3.5.1(xi) and 11.1 of Appendix KK to the CAISO tariff so that SDG&E would not be required to post funds to itself as the interconnection customer and transmission owner.¹

I. MOTION TO INTERVENE

Because SDG&E is requesting waiver from a CAISO tariff requirement, the CAISO has a substantial and direct interest in the proceeding that no other party can adequately represent. The CAISO’s intervention is in the public interest and should be granted.

II. COMMENTS

The CAISO supports SDG&E’s petition, which aligns with similar past petitions approved by the Commission.² The CAISO had revised its tariff to avoid waivers on this

¹ The CAISO moves to intervene and 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 (2018).

² See, e.g., *Pacific Gas and Electric Company*, 165 FERC ¶ 61,009 (2018) (“PG&E”); *San Diego Gas & Electric Company*, 163 FERC ¶ 61,205 (2018). The CAISO notes that in its petition at p. 1 n. 1, SDG&E cites to *San Diego Gas & Electric Company*, 163 FERC ¶ 61,206 (2018). This is a typographical error as the final 6 should be a 5: *San Diego Gas & Electric Company*, 163 FERC ¶ 61,205 (2018).

issue for several years,³ and plans to revise its new interconnection procedures in compliance with Order No. 2023 to avoid the need for waivers in the future.

The CAISO notes that SDG&E must still remit to the CAISO any funds that would have been considered non-refundable upon withdrawal had it been required to provide the waived deposits. As such, no party will be harmed by SDG&E's request for waiver even if it ultimately withdraws the interconnection requests for its generation projects.

III. CONCLUSION

For the reasons discussed above, the CAISO supports SDG&E's request for waiver.

/s/ William H. Weaver

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Dated: March 28, 2025

³ Section 11.2.1 of Appendix DD to the CAISO tariff ("Interconnection Customers owned by Participating Transmission Owners are not required to post Interconnection Financial Security to themselves. Notwithstanding this exemption, Interconnection Customers owned by Participating Transmission Owners (i) must post Interconnection Financial Security required for Network Upgrades or Participating TO's Interconnection Facilities on other Participating Transmission Owner's systems where required for interconnection; and (ii) must remit to the CAISO an amount equal to any non-fundable portion of the Interconnection Financial Security that would have been forfeited upon withdrawal or termination absent this exemption pursuant to Sections 7.6 and 11.4").

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 28th day of March, 2025.

/s/ Ariana Rebancos

Ariana Rebancos

An employee of the California ISO