



November 1, 2024

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. ER25-171-000**

**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 SunZia Transmission, LLC (SunZia), SunZia Wind South, LLC (SunZia Wind South), and the CAISO, (the LGIA).<sup>1</sup>

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

On October 21, 2024, SunZia submitted the LGIA in Docket No. ER25-171-000, with a requested open-ended effective date because the date on which the LGIA should become effective, *i.e.*, the date on which operational control of the SunZia transmission system will be granted to the CAISO, is unknown. In that filing, SunZia explained that the LGIA includes provisions that do not conform with the CAISO tariff because the LGIA must account for (1) changes associated with implementation of the Subscriber Participating TO model accepted by the Commission<sup>2</sup> and (2) provisions in the current interconnection agreement.

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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.

<sup>2</sup> See CAISO Tariff, Section 4.3A (setting forth the rules governing the relationship between the CAISO and a Subscriber Participating TO).

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. 8431

SunZia serves as the “designated filer” to the LGIA pursuant to the Joint Tariff Filing procedures outlined in Order No. 714.<sup>3</sup> SunZia filed the service agreement under SunZia’s Transmission Owner (TO) Tariff, FERC Electric Tariff Volume No. 2 and designated it as Service Agreement No. 3.

## **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 open-ended<sup>4</sup> effective date for its Certificate of Concurrence for the LGIA, consistent with the open-ended effective date that SunZia requested in its October 21, 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),<sup>5</sup> the CAISO requests that the following individual be placed on the official service list for this proceeding.

John Anders  
Deputy General Counsel  
California Independent System  
Operator Corporation  
250 Outcropping Way  
Folsom, CA 95630  
Tel: (916) 608-7287  
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<sup>3</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).

<sup>4</sup> The CAISO submits the tariff record with an effective date of 12/31/9998. The CAISO will submit an informational filing of the effective date to the Commission in a type 150 filing within five days of the actual effective date.

<sup>5</sup> 18 C.F.R. § 385.203(b)(3).

#### **IV. Service**

The CAISO has served a copy of this filing on SunZia, the California Public Utilities Commission, and all parties with scheduling coordinator agreements under the CAISO tariff. 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. 3 under SunZia's TO (LGIA); and   |
| 2. Attachment B | Concurrence tariff record for the LGIA, designated as Service Agreement No. 8431 under the CAISO tariff and as Service Agreement No. 3 under SunZia's TO. |

#### **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 open-ended effective date and (b) grant the waivers requested herein.

Respectfully submitted,

/s/ John Anders

John Anders

Deputy 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**

**LGIA – SunZia Wind South**

**and the**

**California Independent System Operator Corporation**

**November 1, 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 SunZia Transmission, LLC (“SunZia Transmission”) 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.

**SunZia Transmission’s Service Agreement Adopted by Reference:** Service Agreement No. 3 under **SunZia Transmission’s** Transmission Owner Tariff, FERC Electric Tariff, Volume No. 2.

**Description of Service Agreement Adopted by Reference:** Non-conforming Large Generator Interconnection Agreement among SunZia Wind South LLC, **SunZia Transmission**, and the CAISO, designated as Service Agreement No. 8431.

**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*

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Neil Millar

VP, Transmission Planning and  
Infrastructure Development

Dated: October 31, 2024

**Attachment B – Tariff Record**

**Certificate of Concurrence**

**LGIA – SunZia Wind South**

**and the**

**California Independent System Operator Corporation**

**November 1, 2024**

**California Independent System Operator Corporation  
Service Agreement No. 8431  
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>	SunZia Transmission, LLC
<b>Designated Filing Utility Tariff Program:</b>	Electric Traditional Cost of Service and Market-Based Rates
<b>Designated Filing Company Tariff Title:</b>	Tariffs, Rate Schedules, and Agreements
<b>Designated Filing Utility Tariff Record Adopted by Reference:</b>	Service Agreement No. 3, LGIA – SunZia Transmission, SunZia Wind South, & CAISO