



California Independent
System Operator Corporation

September 24, 2024

The Honorable Debbie-Anne A. Reese
Acting 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 Amended and
Extended Transmission Exchange Agreement Submitted in Docket
No. ER24-3087-000**

Docket No. ER24-3087-000

Dear Secretary Reese:

The California Independent System Operator Corporation ("CAISO") hereby submits for filing a Certificate of Concurrence with respect to the Amended and Extended Transmission Exchange Agreement among the Western Area Power Administration ("WAPA"), Pacific Gas and Electric Company ("PG&E"), and the CAISO (the "Amended and Extended TEA").¹

I. Overview and Designated Filer

On September 20, 2024, PG&E submitted the Amended and Extended TEA in Docket No. ER24-3087-000, with a requested effective date of January 1, 2025. In that filing, PG&E explained that WAPA owns one of the two transmission lines that comprise the Pacific AC Intertie between the Round Mountain and Malin substations ("PACI-W"). Under the current Transmission Exchange Agreement, WAPA and PG&E exchange transmission services using the PACI-W and portions of the transmission facilities owned by PG&E and that are under the operational control of the CAISO. The current Transmission Exchange Agreement terminates on January 1, 2025. Accordingly, the Amended and Extended TEA establishes a new 20-year term with an adjusted quantity of transmission capacity and additional service rights. The Amended and Extended TEA ensures that all of the capacity subject to the exchange of transmission

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.

service remains in the CAISO balancing authority area. The Amended and Extended TEA also supports continued benefits and resolution of the concerns underlying the current Transmission Exchange Agreement.²

Rather than filing a duplicate version of the Amended and Extended TEA, the CAISO is submitting a concurrence tariff record. The concurrence tariff record retains the same CAISO rate schedule designation as the current Transmission Exchange Agreement, CAISO Rate Schedule FERC No. 51.

PG&E serves as the “designated filer” to the Amended and Extended TEA pursuant to the Joint Tariff Filing procedures outlined in Order No. 714.³ PG&E filed the Amended and Extended TEA under its own original rate schedule designation, PG&E Rate Schedule FERC No. 231.

II. Proposed Effective Date

The CAISO requests the Commission establish an effective date of January 1, 2025 for its Certificate of Concurrence for the Amended and Extended TEA, consistent with the January 1, 2025 effective date that PG&E requested in its September 20, 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 to accept the CAISO’s Certificate of Concurrence.

III. Communications

Under Rule 203(b)(3),⁴ the CAISO requests that the following individuals be placed on the official service list for this proceeding.

² See *Pac. Gas & Elec. Co.*, 109 FERC ¶ 61,255, at PP 49-50 (2004) (accepting the current Transmission Exchange Agreement and citing as justification the benefits of avoiding the operational and commercial impacts absent the exchange of transmission service). The Commission’s order accepting the current Transmission Exchange Agreement also included a directive to provide in the CAISO tariff that the capacity exchanged was deemed part of the CAISO controlled grid, which is now reflected in section 4.3.1.4 of the CAISO tariff. *Id.* at P 52, and Commission Letter Order dated April 18, 2005, Docket No. ER04-688-003. Accordingly, the CAISO hereby commits to updating this provision of its tariff consistent with the Commission’s order in Docket No. ER24-3087-000 as soon as practicable following issuance of the order.

³ 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).

⁴ 18 C.F.R. § 385.203(b)(3).

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IV. Service

The CAISO has served a copy of this filing on WAPA, PG&E, 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 the Amended and Extended Transmission Exchange Agreement (PG&E Rate Schedule FERC No. 231); and |
| 2. Attachment B | Concurrence tariff record for the Amended and Extended TEA, designated as CAISO Rate Schedule FERC No. 51 and as PG&E Rate Schedule FERC No. 231. |

VI. Conclusion

For the reasons stated herein, the CAISO respectfully requests that the Commission accept the Certificate of Concurrence contained in this filing with an effective date of January 1, 2025 as explained herein.

Respectfully submitted,

/s/ Marissa Nava

John C. Anders

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Attachment A – Certificate of Concurrence

Amended and Extended Transmission Exchange Agreement

(PG&E Rate Schedule FERC No. 231)

between

PG&E, WAPA,

and the

California Independent System Operator Corporation

September 24, 2024

CERTIFICATE OF CONCURRENCE

This is to certify that the California Independent System Operator Corporation (“CAISO”) assents and concurs in the rate schedule, which Pacific Gas and Electric Company (“PG&E”) as designated filing company, has filed in Docket No. ER24-3087-000. The CAISO hereby files this Certificate of Concurrence in lieu of filing the specified rate schedule.


PG&E’s Rate Schedule Adopted by Reference: PG&E Rate Schedule FERC No. 231.

Description of Rate Schedule Adopted by Reference: Amended and Extended Transmission Exchange Agreement among the Western Area Power Administration (“WAPA”), PG&E, and the CAISO, designated as PG&E Rate FERC Schedule No. 231.

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:

9236FA183EA64FB...

Neil Millar VP,
Infrastructure and
Operations Planning

Dated: September ²³, 2024

Attachment B – Concurrence Tariff Record

Amended and Extended Transmission Exchange Agreement

(PG&E Rate Schedule FERC No. 231)

between

PG&E, WAPA,

and the

California Independent System Operator Corporation

September 24, 2024

California Independent System Operator Corporation
Rate Schedule No. 51
Amended and Extended Transmission Exchange 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 (PG&E)
Designated Filing Utility Tariff Program:	FERC Federal Power Act (Traditional Cost of Service and Market-Based Rates)
Designated Filing Company Tariff Title:	Other Tariffs and Rate Schedules (Tariff ID 3100)
Designated Filing Utility Tariff Record Adopted by Reference:	RS 231, Western Area Power Administration TEA, and all tariff records for which the designated tariff record is a direct or indirect parent record