

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

Pacific Gas & Electric Co.

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Docket No. ER21-1465-000

**COMMENTS OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

The California Independent System Operator Corporation (“CAISO”) respectfully submits comments in response to Pacific Gas and Electric Company’s (“PG&E”) notice of termination in this proceeding.¹ The CAISO supports PG&E’s termination of the Large Generator Interconnection Agreement (“LGIA”) among PG&E, the CAISO, and Alamo Springs I, LLC (“Alamo I”). As explained in PG&E’s notice of termination, Alamo I materially breached the LGIA by failing to provide its third interconnection financial security posting. This interconnection financial security posting is a critical requirement in both the LGIA and the CAISO tariff because it directly finances the construction of the interconnection customer’s required network upgrades and interconnection facilities.² The LGIA and the tariff require this posting at the commencement of construction activities, and PG&E provides additional notice to the interconnection customer.³ Nevertheless, Alamo I failed to provide the necessary interconnection financial security, and failed to cure the breach after repeated notice. Terminating the LGIA and withdrawing Alamo I from the CAISO interconnection queue is required under the

¹ The CAISO 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.

² Section 11.3.2 of Appendix DD to the CAISO tariff.

³ *Id.*

CAISO tariff and the LGIA.⁴ Moreover, other interconnection customers in the CAISO depend on the timely construction of these network upgrades. For these reasons, the Commission should approve PG&E's termination of the LGIA.

/s/ William H. Weaver

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Dated: April 7, 2021

⁴ Section 11.3.1.7 of Appendix DD to the CAISO tariff ("The failure by an Interconnection Customer to timely post the Interconnection Financial Security required by this Section shall constitute grounds for termination of the GIA pursuant to LGIA Article 2.3 or SGIA Article 3.3, whichever is applicable"); Article 17 of the LGIA.

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 7th day of April, 2021.

/s/ Anna Pascuzzo

Anna Pascuzzo