

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

Californians for Green)	
Nuclear Power, Inc.)	
)	
v.)	Docket No. EL21-13-000
)	
North American Electric)	
Reliability Corporation,)	
Western Electricity)	
Coordinating Council,)	
California Independent)	
System Operator Corporation,)	
California Public Utilities)	
Commission,)	
California State Water)	
Resources Control Board, and)	
California State Lands)	
Commission)	

**ANSWER AND MOTION TO DISMISS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

The California Independent System Operator Corporation (CAISO) submits this answer and motion to dismiss in response to the complaint filed by Californians for Green Nuclear Power, Inc. (CGNP) on October 26, 2020 (Complaint).¹ For the reasons explained below, the Commission should dismiss the Complaint as legally insufficient and unsupported.²

¹ The CAISO submits its answer pursuant to Rules 206(f) and 213 of the Commission's Rules of Practice and Procedure, 18 C.F.R. §§ 385.206(f), 385.213, and the Notice of Complaint issued in this proceeding on October 27, 2020. The CAISO submits its motion to dismiss pursuant to Rule 212 of the Rules of Practice and Procedure, 18 C.F.R. § 385.212.

² The CAISO is submitting its answer separately from the other respondents named in the complaint – the North American Electric Reliability Corporation, Western Electricity Coordinating Council, California Public Utilities Commission (CPUC), California State Water Resources Control Board, and California State Lands Commission. The CAISO anticipates they will submit their own answer(s).

I. Executive Summary

CGNP fails to identify any legal standard that applies to its Complaint, much less explain how it satisfies that standard. The Complaint does not state a legally recognizable claim the Commission has the authority to address. CGNP's Complaint is primarily about the actions of entities other than the CAISO and about issues that are regulated by entities other than the Commission. Nor does CGNP allege any specific facts that, if taken as true, would support a finding the CAISO has violated the law or CGNP's requested remedies are justified. The Commission should dismiss or deny the Complaint.

The Complaint concerns the Diablo Canyon Power Plant (DCPP) in California. DCPP consists of one unit scheduled to retired in 2024 and a second unit scheduled for retirement in 2025.³ The Nuclear Regulatory Commission (NRC) licenses all commercially owned nuclear power plants that produce electricity in the United States. Pacific Gas and Electric Company (PG&E) holds the licenses for the two units at DCPP. PG&E decided not to relicense the two DCPP units beyond those planned retirement dates.⁴ In connection with PG&E's decision to withdraw its license renewal application for the DCPP units, the Complaint claims the CAISO and some of the other respondents "have violated NERC's [North American Electric Reliability Corporation] reliability standards for the bulk power system through the approval of the voluntary plan to retire DCPP

³ See https://www.pge.com/en_US/safety/how-the-system-works/diablo-canyon-power-plant/about-the-diablo-canyon-power-plant.page.

⁴ PG&E is not a respondent named in the Complaint.

in 2025 without first properly analyzing the adverse bulk electric system and adverse bulk natural gas system consequences.”⁵

As an initial matter, the legal basis for the Complaint is unclear. CGNP makes vague and broad claims the CAISO and other respondents have violated several statutes and regulations, some of which are natural gas statutes and regulations not applicable to the CAISO as a public utility responsible for exercising operational control over an electric transmission grid and administering wholesale electricity markets under its Commission-approved tariff. The Complaint does reference the Federal Power Act (FPA) and Section 206 of the Commission’s rules. As such, the CAISO treats CGNP’s filing as if it is a complaint submitted pursuant to Section 206 of the FPA. On that basis the Complaint is entirely deficient.

First, CGNP falls far short of carrying its heavy burden of proof under FPA Section 206 to show the CAISO has acted in a manner that is unjust, unreasonable, or unduly discriminatory or preferential. Although the Complaint generally mentions NERC reliability standards, CGNP does not identify any specific NERC reliability standard(s) or requirement(s) within a standard the CAISO has supposedly violated, much less show the CAISO has violated any of them. In fact, the CAISO complies with all applicable planning standards for its balancing authority area.

The Complaint also fails to satisfy the minimum requirements under the Commission’s rules governing complaints. It does not allege relevant facts, the

⁵ Complaint at 4. Pages 1-2 and 5 of the Complaint set forth the same vague allegations.

position taken by CGNP, and the basis in fact or law for such position. Nor does the Complaint clearly identify the action or inaction that is alleged to violate applicable statutory standards, or explain how the CAISO has violated those statutory standards.

For these reasons, Commission precedent requires the Commission dismiss or deny the Complaint.

II. Answer

A. The Legal Basis for CGNP's Pleading Is Unclear

CGNP states it filed the Complaint “[p]ursuant to the Federal Power Act, Energy Policy Act of 2005, the Natural Gas Act of 1938, the Federal Pipeline Safety Regulations, and Section 206 of the [Commission’s] Rules of Practice and Procedure.”⁶ However, CGNP fails to cite any specific statutory provision the CAISO allegedly has violated. The legal basis for the Complaint is unclear.

The CAISO is not even subject to some of the statutes CGNP cites. The CAISO is a public utility and an Independent System Operator approved by the Commission with responsibilities for exercising operational control over an electric transmission grid and administering wholesale electricity markets approved by the Commission. The CAISO has no responsibilities for natural gas storage, transportation, or distribution. Thus, no provisions of the Natural Gas Act of 1938 or the Federal Pipeline Safety Regulations apply to the CAISO. The CAISO is subject to the FPA and to the Energy Policy Act of 2005 (EPAAct 2005)

⁶ Complaint at 1 & nn. 1-2 (citing the entirety of those statutes and regulations).

to the extent applicable, but again CGNP does not allege the CAISO has violated any specific provisions of those statutes.⁷

CGNP's cites Section 206 of the Commission's Rules of Practice and Procedure,⁸ which are the regulations that implement Section 206 of the FPA.⁹ Therefore, the CAISO responds below to CGNP's filing as if it is a complaint submitted pursuant to FPA Section 206.

B. CGNP Fails to Show the CAISO Violated FPA Section 206

FPA Section 206 permits the filing of a complaint to show that “any rate, charge, or classification, demanded, observed, charged, or collected by any public utility for any transmission or sale subject to the jurisdiction of the Commission, or that any rule, regulation, practice, or contract affecting such rate, charge, or classification is unjust, unreasonable, unduly discriminatory or preferential.”¹⁰ The complainant bears the burden of proof under FPA Section 206.¹¹ Specifically, the Courts and the Commission have long recognized the complainant “carries the heavy burden of making a convincing showing that [an existing rate, practice, *etc.* subject to Commission jurisdiction] is invalid because

⁷ CGNP does note that Section 215 of the FPA, enacted as part of EPAct 2005, “created the current mandatory reliability standards and enforcement mechanism that protect the reliability of the bulk power system.” *Id.* at 2. CGNP also notes that NERC develops mandatory and enforceable reliability standards pursuant to Section 215 of the FPA, and regional entities that include the Western Electricity Coordinating Council (WECC) serve as regional compliance authorities. *Id.*

⁸ 18 C.F.R. § 385.206.

⁹ 16 U.S.C. § 824e.

¹⁰ 16 U.S.C. § 824e(a).

¹¹ 16 U.S.C. § 824e(b). See also *CXA La Paloma, LLC v. Cal. Indep. Sys. Operator Corp.*, 169 FERC ¶ 61,045, at P 36 (2019) (“*La Paloma*”); *FirstEnergy Serv. Co. v. FERC*, 758 F.3d 346, 353 (D.C. Cir. 2014); *Md. Pub. Serv. Comm’n v. FERC*, 632 F.3d 1283, 1285 n.1 (D.C. Cir. 2011).

it is unjust and unreasonable in its consequences.”¹² “Rather than bald allegations, [the complainant] must make an adequate proffer of evidence including pertinent information and analysis to support its claims.”¹³

CGNP falls far short of meeting its burden of proof under FPA Section 206. CGNP summarily argues the CAISO and some of the other respondents “have violated NERC’s reliability standards for the bulk power system through the approval of the voluntary plan to retire DCPD in 2025 without first properly analyzing the adverse bulk electric system and adverse bulk natural gas system consequences.”¹⁴ Although the discussion in the Complaint touches discursively on a number of topics,¹⁵ CGNP does not identify any specific NERC reliability standards the CAISO supposedly has violated, much less attempt to show the CAISO violated any of them.¹⁶ CGNP instead makes only bald allegations and provides no evidence, pertinent information, or analysis, to support its allegations.

¹² *FPC v. Hope Natural Gas Co.*, 320 U.S. 591, 602 (1944). Although Hope addressed Section 5 of the Natural Gas Act, the Commission properly applies these bedrock principles to the analogous provisions of the FPA. See, e.g., *Cal. Mun. Utils. Ass’n v. Cal. Indep. Sys. Operator Corp.*, 126 FERC ¶ 61,315, at P 70 (2009), *order on reh’g*, 143 FERC ¶ 61,174 (2013).

¹³ *Californians for Renewable Energy, Inc., et al. v. Pac. Gas & Elec. Co., et al.*, 142 FERC ¶ 61,143, at P 18 (quoting *Ill. Mun. Elec. Agency v. Cent. Ill. Pub. Serv. Co.*, 76 FERC ¶ 61,084, at 61,482 (1996)).

¹⁴ Complaint at 4. Pages 1 and 5 of the Complaint set forth the same vague allegations.

¹⁵ For example, CGNP states the Complaint “establishes the need for an in-depth FERC reliability analysis regarding how DCPD protects California’s public safety, benefits ratepayers, and prevents air pollution at all times.” *Id.* at 6. See also *id.* at 20. CGNP fails to identify any legal basis for the Commission to take such a “reliability analysis” of the extent to which a particular generating facility may be beneficial.

¹⁶ As discussed below in Section II.C of this filing, the CAISO has complied with all applicable NERC reliability standards.

Moreover, the primary facts discussed in the CGNP Complaint relate to matters regulated by the NRC and not by this Commission. CGNP takes issue with the decision to withdraw the license renewal application for the DCPD units that would be needed to obtain authorization for the DCPD to operate beyond 2025. However, nuclear power plant licensing is regulated by the NRC. In addition, CGNP ignores that PG&E holds the licenses to DCPD and was the entity that decided whether to seek to relicense the nuclear power plant. The CAISO does not hold any NRC licenses and has no authority to approve or deny any request for a nuclear power plant license extension.

For these reasons, the Commission should deny the Complaint, if it does dismiss it.¹⁷

C. The Complaint Does Not Show the CAISO Has Violated Any Reliability Standards

As discussed above, the Complaint fails to identify any specific NERC reliability standards that have been violated, much less allege a single fact that would show the CAISO has violated any NERC reliability standards.¹⁸ On that basis alone, the CAISO need not address the specifics of any reliability standards to show that the Complaint should be dismissed or denied.

¹⁷ As discussed below in Section III of this filing, the Commission should dismiss the Complaint on the grounds that it fails to satisfy the Commission's minimum requirements for complaints.

¹⁸ The Complaint suggests that the CAISO and other respondents "have violated federal reliability standards for the bulk power system through the CPUC's approval the plan to close Diablo Canyon Power Plant ("DCPP") in 2025 without first properly analyzing the adverse bulk electric system and adverse bulk natural gas system consequences" Complaint at 1 (footnote omitted). The Complaint does not explain how a CPUC decision can violate reliability standards. In addition, the CAISO does not control the actions of the CPUC, so a CPUC decision could not be the basis for alleging the CAISO has violated reliability standards.

Nevertheless, the CAISO notes the great importance it places on complying with applicable NERC/WECC planning standards for the reliability of the CAISO balancing authority area.

The CAISO is in full compliance with the NERC Transmission Planning (TPL) standards. Most importantly, for purposes of evaluating the Complaint, the decision to close DCPD does not constitute a violation of the TPL standards or any other NERC or WECC reliability standard. The Complaint does not allege the CAISO has violated the TPL standards or failed to “plan” the system for the absence of DCPD. Indeed, the Complaint does not even address these “system planning” issues; it only objects to the decision to close DCPD.

The TPL standards merely set requirements for the CAISO’s assessment of its portion of the Bulk Electric System (BES).¹⁹ They require the CAISO to conduct an Annual Planning Assessment for the Near-Term Planning Horizon and the Long-Term Planning Horizon. The CAISO must perform these annual planning studies to determine if the BES under its control meets applicable planning requirements based on specified assumptions. A review of the CAISO’s website shows the CAISO complies with the applicable TPL standards by conducting a transmission planning process that culminates in issuance of an annual transmission plan.²⁰ The CAISO completed its most recent annual planning assessment to comply with the TPL standards in March 2020.²¹

¹⁹ See NERC Reliability Standards TPL-001-4 and TPL-001-5.

²⁰ <http://www.aiso.com/planning/Pages/TransmissionPlanning/Default.aspx>

²¹ <http://www.aiso.com/Documents/ISOBoardApproved-2019-2020TransmissionPlan.pdf>

The following discussion briefly demonstrates the CAISO has assessed its portion of the BES in annual transmission planning processes with the closure of DCPD.

Starting with the 2012-2013 Transmission Plan, the CAISO conducted a specific analysis regarding nuclear plant retirement.²² The CAISO concluded:

- The absence of the DCPD appears not to have negative impact on the reliability of the ISO transmission system with the assumption that there is sufficient deliverable generation within the ISO controlled grid; and
- Additional studies are required to determine if the system has sufficient reactive margin with higher load.²³

Other than this special study, up to and including the 2015-2016 transmission planning process, the CAISO assumed DCPD was in-service, modeled it online, and assumed license renewal to continue operation of the plant.

Starting with the 2016-2017 transmission planning process, the CAISO modeled DCPD off-line based on the Once Through Cooling compliance dates -- December 31, 2024 for Unit 1 and December 21, 2025 for Unit 2. The CAISO stated:

The studies identified high voltages in the 500 kV system in Central California starting from 2026 when Diablo Canyon Nuclear Power Plant retires. The ISO is considering installing additional reactive devices - preferably dynamic - so that they could both absorb reactive power under normal system conditions and supply reactive power with contingencies as needed. The ISO is working with PG&E on the reactive modeling and will be conducting a detailed

²² 2012-2013 Transmission Plan, Section 3.5 Nuclear Generation Backup Studies (starting at page 159), available at <http://www.caiso.com/Documents/BoardApproved2012-2013TransmissionPlan.pdf>

²³ *Id.* at 169.

assessment to determine reactive needs on the bulk system in the 2017-2018 Transmission Planning Process.²⁴

The CAISO's planning assessment in the 2017-2018 Transmission Plan similarly assumed the closure of DCP. The CAISO concluded:

The studies identified high voltages in the 500 kV system in Central California starting when Diablo Canyon Nuclear Power Plant retires, which is currently planned for 2025 and reflected in the 2027 cases. It is recommended to consider installing additional reactive devices, preferably dynamic, so that they could both absorb reactive power under normal system conditions and supply reactive power with contingencies as needed. A more detailed study will specify exact locations, sizes and types of this reactive support.²⁵

In the 2018-2019 Transmission Plan, the CAISO recommended, and the CAISO Board approved, new transmission solutions to address reliability issues caused by the closure of DCP:

- In addition to the identified thermal overloads, high voltages were observed on the 500 kV system in Central California after Diablo Canyon Power Plant retires. In the northern part of the 500 kV system high voltages were observed under normal system conditions, and low voltages observed with contingencies. To address voltage issues identified in central and northern PG&E bulk system two projects are recommended for approval.
 - Gates 500 kV Dynamic Voltage Support
 - Round Mountain 500 kV Dynamic Voltage Support.²⁶

²⁴ 2016-2017 Transmission Plan at 70 (March 17, 2017), available at http://www.caiso.com/Documents/Board-Approved_2016-2017TransmissionPlan.pdf

²⁵ 2017-2018 Transmission Plan at 87 (March 22, 2018), available at http://www.caiso.com/Documents/BoardApproved-2017-2018_Transmission_Plan.pdf

²⁶ 2018-2019 Transmission Plan at 93 (March 29, 2019), available at http://www.caiso.com/Documents/ISO_BoardApproved-2018-2019_Transmission_Plan.pdf

The CAISO completed the competitive solicitations for these two projects in 2020 and awarded the projects to affiliates of LS Power.²⁷

The CAISO's most recent transmission plan -- the 2019-2020 Transmission Plan -- also models DCPD offline.²⁸

Thus, the CAISO has undertaken the requisite annual transmission planning assessments, and has complied fully with the requirements of the TPL reliability standards. As indicated above, the TPL requirements are not intended to prohibit -- and cannot prohibit -- the closure of a generation plant. Thus, the mere decision of the CPUC to support the retirement of DCPD cannot cause the CAISO to be in violation of the TPL standards or any other NERC reliability standard.

D. CGNP's "Data Request" Is Impermissible

On November 9, 2020, CGNP sent a document to the CAISO purporting to be a data request "under 18 CFR § 385.406."²⁹ However, this document does not comply with the procedures for issuing data requests in Subpart D of the Commission's Rules of Practice and Procedure (18 C.F.R. Part 385), which includes the regulation (18 C.F.R. § 385.406) that CGNP cites.³⁰ CGNP ignores Rule 401 governing the applicability of Subpart D states that "this subpart [D]

²⁷ <http://www.caiso.com/Documents/Gates500kVDynamicReactiveSupport-ProjectSponsorSelectionReport.pdf> and <http://www.caiso.com/Documents/RoundMountain500kVAreaDynamicReactiveSupportProject-ProjectSponsorSelectionReport.pdf>

²⁸ 2019-2020 Transmission Plan at 51 (March 25, 2020), available at

<http://www.caiso.com/Documents/ISOBoardApproved-2019-2020TransmissionPlan.pdf>

²⁹ Because the purported data request was not filed with the Commission, the CAISO provides it for the Commission's reference in Attachment A hereto.

³⁰ Subpart D consists of 18 C.F.R. §§ 385.401 – 385.411.

applies to discovery in proceedings set for hearing under subpart E of this part, and to such other proceedings as the Commission may order.”³¹

Commission precedent establishes that “discovery under subpart D of Part 385 of the Commission's regulations only occurs in the context of a hearing” or pursuant to a Commission directive requiring discovery.³² “Because [the Commission has] not set this matter for hearing, formal discovery is not available in this proceeding.”³³ Nor does this case justify any discovery for the reasons discussed above. Therefore, the Commission should find CGNP’s data request is procedurally illegitimate and unjustified.

III. Motion to Dismiss

The Commission’s Rules of Practice and Procedure require any complaint to satisfy certain minimum requirements. Specifically, Rule 203 requires all pleadings contain the “relevant facts” and the “position taken by the participant . . . and the basis in fact and law for such position.”³⁴ Similarly, Rule 206 requires a complainant to “[c]learly identify the action or inaction which is alleged to violate applicable statutory standards or regulatory requirements [and] [e]xplain how the action or inaction violates applicable statutory standards or regulatory

³¹ 18 C.F.R. § 385.401(a).

³² *Pub. Utils. Comm’n of the State of Cal. v. El Paso Nat. Gas Co.*, 91 FERC ¶ 61,312, at 62,083 (2000).

³³ *ISO New Eng. Inc. & New Eng. Power Pool*, 147 FERC ¶ 61,172, at P 22 (2014). See *also id.* (explaining that the Commission has “in rare circumstances directed discovery in proceedings not set for hearing”).

³⁴ 18 C.F.R. §§ 385.203(a)(6)-(7).

requirements.”³⁵ A complainant must state a legally recognizable claim that the Commission has the statutory or regulatory power to address.³⁶

The Commission previously has dismissed complaints that fail to meet these minimum requirements.³⁷ It should do the same in the instant proceeding.³⁸ As was true of prior complaints the Commission has dismissed, CGNP’s Complaint “consists of a string of vague and unsupported allegations” that the FPA and other statutes have been violated and “fails to clearly and with specificity articulate the action or inaction which is alleged to violate applicable statutory standards or regulatory requirements.”³⁹ Consequently, “[t]he Commission is unable to discern the specific violations of the FPA [and other statutes] that are alleged.”⁴⁰ For these reasons, the Commission should dismiss the Complaint, and if it does not dismiss the Complaint, the Commission should deny it.

³⁵ 18 C.F.R. §§ 385.206(b)(1)-(2).

³⁶ See, e.g., *Californians for Renewable Energy, Inc. v. Cal. Indep. Sys. Operator Corp.*, 117 FERC ¶ 61,072, at PP 8-11 (2006).

³⁷ See, e.g., *Californians for Renewable Energy, Inc. v. Pac. Gas & Elec. Co., et al.*, 134 FERC ¶ 61,060, at PP 54-64, *reh’g denied*, 134 FERC ¶ 61,207, at PP 7-10 (2011); *Californians for Renewable Energy, Inc. v. Cal. Pub. Util. Comm’n, et al.*, 129 FERC ¶ 61,075, at PP 11-15 (2009).

³⁸ CGNP’s asserts that its Complaint is “[i]n compliance with Rule 206” (Complaint at 5), but merely asserting it does not make it so unless CGNP actually satisfies the Rule 206 requirements.

³⁹ *Californians for Renewable Energy, Inc. v. Pac. Gas & Elec. Co., et al.*, 142 FERC ¶ 61,143, at P 18 (2013).

⁴⁰ *Californians for Renewable Energy, Inc. v. Pac. Gas & Elec. Co., et al.*, 142 FERC ¶ 61,143, at P 18 (2013).

IV. Service and Communications

All service of pleadings and documents and all communications regarding this proceeding should be addressed to the following:

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V. Conclusion

For the foregoing reasons, the Commission should dismiss the Complaint submitted by the Complainants in this proceeding or deny the Complaint in its entirety.

Respectfully submitted,

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Dated: November 16, 2020

ATTACHMENT A



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November 9, 2020

RE: Data Request Under 18 CFR § 385.406 in FERC Docket EL21-13

Hello, Attorneys Ivancovich and Atkins:

Pursuant to the Commission's *Rules of Practice and Procedure*, Complainant Californians for Green Nuclear Power, Inc.(CGNP) respectfully makes the following data request of Respondent CAISO Corporation.

1. CGNP requests the total ratepayer burden associated with the dispatch and curtailment of California solar and wind generation. There are substantial ratepayer burdens associated with the integration of solar and wind into the California power grid. CGNP requests this information on a month-by month basis for the months from January, 2015 through October, 2020, inclusive. California Assemblyman Brian Dahle stated during the floor session regarding SB 100 on August 28, 2018 that California was paying ratepayers in Oregon, Nevada, and Arizona a billion dollars a year to take California's excess solar power. Furthermore, monthly self-curtailment totals significantly increased in January, 2019 to present compared to the corresponding months in 2018.

Here are the monthly curtailment data for 2020 copied from CAISO's public website.

CAISO Monthly Curtailment Data - 2020

End-of-Month YTD Curtailed MWh

Month	LocalEconomic	LocalSelfSchCut	SystemEconomic	Total
January	126,394	280	11,329	138,003
February	228,236	4,705	62,119	295,060
March	380,919	10,877	82,346	474,142
April	659,516	13,331	119,739	792,586
May	774,065	19,860	253,990	1,047,915
June	824,561	20,196	409,568	1,254,325
July	853,749	20,302	411,142	1,285,193
August	873,151	20,330	414,915	1,308,396
September	928,373	20,349	416,433	1,365,155
October	1,025,181	20,848	418,390	1,464,419
November				-
December				-

Source: End of Month Summaries from CAISO's "Wind and solar daily curtailment report "

Source URL:

<http://www.caiso.com/market/Pages/ReportsBulletins/RenewablesReporting.aspx#MonthlyRenewables>

Archived 11 08 20 by CGNP

2. Detailed month-by-month solar and wind curtailment summaries are provided for the year 2020 for the months from January, 2020 to April 2020 on the above webpage from CAISO's public website. CGNP requests the detailed month-by-month solar and wind curtailment summaries for the months from May, 2020 to October, 2020, inclusive.

An electronic reply within ten (10) business days to CGNP's data request is sought..

Sincerely,

/s/ Gene Nelson, Ph.D. CGNP Legal Assistant
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CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all of the parties listed on the official service list for the captioned proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California this 16th day of November, 2020.

/s/ Martha Sedgley

Martha Sedgley