

Folsom, California 95630. The CAISO is the Balancing Authority Area Operator responsible for the reliable operation of the electric grid consisting of the transmission systems of a number of utilities, including PG&E, as well as the coordination of the day-ahead and real-time energy and ancillary services markets in California. The CAISO is also a Transmission Operator; and must comply with mandatory reliability standards applicable to balancing authority areas, including EOP-005-3, that requires the CAISO to maintain a system restoration plan. Pursuant to the Commission's Rules of Practice and Procedure 203(b)(3), the CAISO respectfully requests that the all communications and notices concerning this motion and this proceeding be provided to:

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III. CAISO INTEREST

As the Balancing Authority Area Operator and Transmission Operator responsible for maintaining reliability of PG&E's transmission system that is part of the CAISO Controlled Grid, and as a party to the Black Start Agreement with PG&E, the CAISO has a unique interest. Accordingly, the CAISO has a direct and substantial interest in this proceeding. Because no other party can adequately represent the CAISO's interests in this proceeding, the Commission should grant the CAISO's request to intervene as a party.

IV. COMMENTS

The amendment filed by PG&E seeks to extend the terms of the parties' Black Start Agreement through December 31, 2020, as well as include bankruptcy related provisions regarding PG&E's Chapter 11 Bankruptcy and update the contacts for notice under the agreement. The CAISO supports acceptance of the amendment to the Black Start Agreement filed by PG&E. Acceptance by the Commission will facilitate ongoing provisions of black start service from PG&E generating units, which support the CAISO's system restoration plan.

Respectfully submitted,

By: /s/ Andrew Ulmer

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Dated: November 12, 2019

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 12th day of November 2019.

Anna Pascuzzo
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