



California ISO



November 30, 2022

Jonathan Bishop
Chief Deputy Director
California State Water Resources Control Board
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SUBJECT: Use of the Once-Through Cooling Power Plants in the Strategic Reserve

Dear Mr. Bishop:

The California Public Utilities Commission (CPUC), The California Energy Commission (CEC) and the California Independent System Operator (CAISO) seek to provide additional clarification regarding the recommendation to extend the compliance deadlines of the Alamitos (Units 3, 4 & 5), Huntington Beach (Unit 2), and Ormond Beach (Units 1 & 2) power plants in the *Draft 2022 Special Report of the Statewide Advisory Committee on Cooling Water Intake Structures*, which was approved by the Statewide Advisory Committee on Cooling Water Intake Structures (SACCWIS) on September 30, 2022.

If it was not clear in the report, the CPUC, CEC and CAISO clarify that our recommendation is contingent upon these power plants participating in the Strategic Reliability Reserve Program (Strategic Reserve) created by Assembly Bill (AB) 205 that is discussed on pages 7 and 8 of the report. Under this program, these resources will only be called upon to support grid operations during extreme events (including any maintenance or test events recommended by and coordinated with the CAISO),

These resources would not serve as Resource Adequacy resources. For resources under a Resource Adequacy contract, there is a “must offer obligation” to provide the resource to the CAISO markets for CAISO operation on a consistent basis. Operation under a Resource Adequacy must offer obligation would likely lead to increased electricity generation as compared to the operation of the resource under the Strategic Reserve under an extreme event. This would lead to increased use of once through cooling as well as increased air emissions, which AB 205 seeks to limit.

The CPUC, CEC, and CAISO recommend the State Water Resources Control Board extend the Water Quality Control Policy on the Use of Coastal and Estuarine Waters for Power Plant

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Cooling (OTC Policy) compliance dates for Alamitos, Huntington Beach, and Ormond Beach through December 31, 2026, to support the AB 205 Strategic Reserve. We are committed to realizing full compliance with the OTC Policy in the coming years, while maintaining the reliability of California's electric system and meeting the state's environmental and energy goals.

Thank you for your consideration. Please contact us if you have any questions.

Sincerely,



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