

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding  
Microgrids Pursuant to Senate Bill 1339

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Rulemaking 19-09-009  
(Filed Sep. 12, 2019)

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

Pursuant to the Commission’s September 19, 2019 *Order Instituting Rulemaking Regarding Microgrids Pursuant to Senate Bill 1339* (OIR), the California Independent System Operator Corporation (CAISO) hereby files comments regarding the Preliminary Scoping Memo and issues raised in the OIR.

The CAISO is the Balancing Authority and wholesale electricity market operator for 80 percent of California, responsible for maintaining operating conditions under mandatory reliability standards issued by the North American Electric Reliability Corporation. As such, the CAISO has a significant and unique interest in this proceeding, and can offer valuable experience to the Commission. Previously, the CAISO worked with Commission and Energy Commission staff on the Roadmap for Commercializing Microgrids in California.

The Commission’s current scoping proposal includes facilitating “the formation of a working group to codify standards and protocols needed to meet . . . CAISO microgrid requirements. . . .”<sup>1</sup> The CAISO appreciates the Commission’s consideration and looks forward to continuing its work with the Commission and parties on these

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<sup>1</sup> OIR at p. 7.

critical issues for California's future.

Respectfully submitted,

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