



Mark Rothleder
Senior Vice President and Chief Operating Officer

July 2, 2021

California Energy Commission
Docket Unit, MS-4
Docket No. 01-AFC-07C
1516 Ninth Street
Sacramento, CA 95814-5512

Re: 01-AFC-7C Russell City Energy Company

The California Independent System Operator Corporation (CAISO) supports the request of Russell City Energy Company, LLC (Russell City) to deploy temporary safety modifications to the steam turbine condenser at the Russell City Energy Center (RCEC), which would allow the facility to operate in simple-cycle mode. The CAISO requests the California Energy Commission approve Russell City's request.

Electric generation resources, such as RCEC, play a particularly important role in supporting electric grid reliability requirements. First, RCEC provides capacity and energy necessary to the entire CAISO system. California and the western United States have already experienced very tight electric supply conditions this summer and the CAISO projects these conditions to continue. On June 29, 2021, leadership from the California Public Utilities Commission (CPUC) and CEC requested the CAISO to take steps to procure additional resources for this summer because the State needs to deploy every tool that is available to ensure electric grid reliability.¹ Russell City's proposal would bring critically needed electric supply back into service to support the public health and welfare of the citizens of California. Second, RCEC is located in a transmission-constrained local capacity area in which the CAISO cannot easily replace RCEC with transfers of energy. Without this capacity, the risk of insufficient electric supply in the San Francisco Bay Area increases. Finally, RCEC is equipped with the apparatus necessary to restart the electric grid after a catastrophic loss of service (a "black-start" event). As such, RCEC's availability is critical to meet electric grid reliability needs.

¹ See Joint Statement from the CPUC President Marybel Batjer, CEC Chair David Hochschild, and California ISO CEO Elliot Mainzer on decision to procure additional energy resources for summer <http://www.caiso.com/Documents/CapacityProcurementMechanismSignificantEvent-JointStatementandLetter.pdf>.

The State of California must take steps necessary to ensure there are resources available to meet its electric generation capacity and energy needs this summer. Approving the request of Russell City is an important step in meeting those needs.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mark Rothleder', with a long horizontal stroke extending to the right.

Mark Rothleder
Senior Vice President and Chief Operating Officer