

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

MATL LLP)

Docket No. ER25-3481-000

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

The California Independent System Operator Corporation (CAISO)¹ submits these comments supporting the proposed revisions to MATL LLP's (MATL) Open Access Transmission Tariff (OATT) filed in this proceeding on September 22, 2025.²

I. Intervention

The CAISO is a non-profit public benefit corporation organized under the laws of the State of California with its principal place of business at 250 Outcropping Way, Folsom, CA 95630. The CAISO is the Balancing Authority responsible for the reliable operation of the electric grid within its Balancing Authority Area consisting of the transmission systems of a number of utilities, including Pacific Gas & Electric Company, Southern California Edison Company and San Diego Gas & Electric Company. The CAISO also coordinates the day-ahead, real-time energy and ancillary services markets in its Balancing Authority Area and operates the Western Energy Imbalance Market (WEIM) and will operate the Extended Day-Ahead Market (EDAM) in other Balancing Authority

¹ Capitalized terms not otherwise defined herein have the meanings set forth in Appendix A to the CAISO Tariff.

² The CAISO files these comments pursuant to Rule 211 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.211.

Areas. As the entity responsible for maintaining reliability of the CAISO Controlled Grid, operator of WEIM and future operator of EDAM, the CAISO has a unique interest in this Commission proceeding. The CAISO requests that it be permitted to intervene with full rights of a party.³ Because no other party can adequately represent the CAISO's interests, the CAISO's intervention is in the public interest and should be granted.

II. Comments

The MATL OATT filing will enable MATL, its transmission customers, and affiliated balancing authority, Power Watch, LLC ("Power Watch"), to participate in the Western Energy Imbalance Market ("WEIM") administered by the CAISO in alignment with the WEIM provisions under the CAISO Tariff. MATL's proposed OATT revisions were made available for stakeholder comment and the relationship between MATL and Power Watch was explained to the CAISO, which is reflected in the MATL OATT.⁴

The WEIM has been operating successfully for over a decade, generated nearly \$7 billion in cumulative benefits and will continue to serve balancing areas participating in the WEIM.⁵ Power Watch's participation in the WEIM will increase the market area and include the U.S. portion of the Montana Alberta Tie Line, a 230 kV transmission line connecting the Montana electrical grid at Great

³ The CAISO files this motion to intervene pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214.

⁴ See *also* Docket No. ER25-3480 (pending before the Commission and including Attachment Q to the MATL OATT: Balancing Authority Area and EIM Entity Services Agreement).

⁵ The WEIM is sometimes also called the Energy Imbalance Market or EIM.

Falls, Montana and the Alberta electrical grid at Lethbridge, Alberta.⁶

The CAISO reviewed the MATL OATT and found the proposed revisions in alignment with the Commission-approved CAISO Tariff requirements for WEIM participation. The CAISO recognizes that MATL's proposed WEIM-related OATT revisions are generally modeled on revisions proposed by other entities who have entered the WEIM and which have been accepted by the Commission. In addition, MATL has provided for the unique bifurcated roles of MATL as an EIM Transmission Service Provider and Power Watch as the EIM Entity. The MATL OATT specifically distinguishes between the EIM Entity and EIM Transmission service provider roles in Attachment P and addresses how these roles will be fulfilled as required by the CAISO Tariff.⁷ The CAISO believes that this bifurcated framework supports MATL, its transmission customers and Power Watch's participation in the WEIM because the roles and responsibilities of the EIM Transmission Service Provider and EIM Entity are accounted for and in alignment with the CAISO tariff.

⁶ The EIM Entity Agreement between Power Watch and the CAISO is pending before the Commission in Docket No. ER25-3552. This agreement addresses Power Watch's participation as a generation only balancing authority area in the WEIM.

⁷ See, e.g., MATL OATT at Section 1.72 (defining Power Watch as the EIM Entity), Section 12.7 (distinguishing roles for purposes of dispute resolution), and Attachment P at 1.1 and 1.2 (delineating the EIM Entity and EIM Transmission Service Provider roles). This relationship is also supported by the Balancing Authority and EIM Entity Services Agreement between MATL and Power Watch. *Supra*, fn. 3.

III. Correspondence

In accordance with Rule 203(b)(3) to the Commission's Rules of Practice and Procedure,⁸ the CAISO respectfully requests that all correspondence and other communications regarding this filing be directed to the following:

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Deputy General Counsel
California Independent System
Operator Corporation
250 Outcropping Way
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IV. Conclusion

For the foregoing reasons, the CAISO requests that the Commission accept the MATL OATT filing in an order issued by December 8, 2025, without modification or condition.

Respectfully submitted,

/s/ John C. Anders
John C. Anders

Roger E. Collanton
General Counsel
John C. Anders
Deputy General Counsel
California Independent System
Operator Corporation

Counsel for the California Independent System
Operator Corporation

Dated: October 14, 2025

⁸ 18 C.F.R. § 385.203(b)(3).

CERTIFICATE OF SERVICE

I certify that I have served the foregoing document upon the parties listed on the official service list in the above-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, CA this 14th day of October, 2025.

/s/ Jacqueline Meredith

Jacqueline Meredith