

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

Sentinel Energy Center LLC

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Docket No. ER25-58

**MOTION TO INTERVENE AND COMMENTS OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

The California Independent System Operator Corporation (CAISO) files this motion to intervene and comments on the Amended Black Start Agreement filed by Sentinel Energy Center, LLC (Sentinel) in this proceeding.¹ The CAISO and Southern California Edison Company (SCE) are signatories to the Amended Black Start Agreement.

I. The Commission should accept the Amended Black Start Agreement.

Sentinel filed a Black Start Agreement on November 28, 2023 between itself, SCE and the CAISO in Commission docket ER24-399. Since that filing, Sentinel has revised its costs and undertaken additional steps to deploy black start capability at its natural gas-fired generating facility in Southern California. The Amended Black Start Agreement will facilitate installation of a battery electric storage system to support the provision of black start service from four units at Sentinel's natural gas-fired generating facility, which is an existing simple cycle power plant, for a ten-year term. Provision of

¹ The CAISO makes this filing pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214.

black start service from Sentinel's generating facility will significantly improve system restoration capabilities in Southern California, thereby saving life and property and mitigating the potential for catastrophic economic disruption to the region in the event of a system-wide power outage. The Commission should accept the Amended Black Start Agreement effective on the date requested by Sentinel. Even if subject to refund, acceptance of the Amended Black Start Agreement will allow Sentinel to provide black start service and the CAISO to compensate Sentinel for doing so.

II. Description of the CAISO and Communications

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

Andrew Ulmer
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III. CAISO Interest

As the Balancing Authority and Transmission Operator responsible for maintaining reliability of SCE's transmission system that is part of the CAISO Controlled Grid, and as a party to the Black Start Agreement with Sentinel, the CAISO has a unique interest in any Commission proceeding that affects this Black Start Agreement. Accordingly, the CAISO has a direct and substantial interest in this proceeding and requests that the Commission permit it to intervene with full rights as a party. Because no other party can adequately represent the CAISO's interests in this proceeding, the CAISO's intervention is in the public interest.

IV. Conclusion

The Commission should accept the Amended Black Start Agreement between Sentinel, the CAISO, and SCE. The Amended Black Start Agreement will benefit transmission customers by enhancing system restoration capability in Southern

California in the event of a widespread power outage that requires the CAISO and SCE to implement black start procedures.

Respectfully submitted,

/s/ Andrew Ulmer

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Dated: October 29, 2024

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 29th day of October, 2024.

/s/ Ariana Rebancos
Ariana Rebancos