

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

Oakland Power Company, LLC )

Docket No. ER23-574-000

**STATEMENT OF THE CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR CORPORATION IN SUPPORT OF REQUESTED  
AMENDMENT TO MUST-RUN SERVICE AGREEMENT**

Pursuant to the Joint Offer of Settlement and Settlement Agreement (Settlement) filed by Oakland Power Company LLC (Oakland Power) in Docket No. ER22-290-000 on May 10, 2023 and the Letter Order of the Federal Energy Regulatory Commission (“FERC” or “Commission”) dated August 24, 2023, approving that Settlement, 184 FERC ¶ 61,120 (2023), the California Independent System Operator Corporation (“CAISO”) hereby submits this Statement of Support for the Amendment to Must-run Service Agreement (RMR Agreement) for Recovery of Costs of CARB Compliance filing made by Oakland Power on September 25, 2023, under the terms of the Settlement in this docket.

**I. Background**

The CAISO is the balancing authority responsible for the reliable operation of the electric grid comprising the transmission systems of a number of utilities. As part of those obligations, it has an RMR Agreement with Oakland Power, under which Oakland makes annual rate filings. The CAISO filed Notices of Intervention in the rate filing for Contract Years 2022 (Docket No. ER22-290-000), and it supported the Settlement in this docket that provided for Oakland to make a filing amending the RMR Agreement to enable it to recover the costs of emissions allowances incurred in 2022

and 2023 to comply with its obligations under California's Cap-and-Trade Program, but requiring an offset against payments Oakland was otherwise entitled to for service in excess of the Contract Service Limits set forth on Schedule A of its RMR Agreement. As part of that Settlement, the CAISO agreed to submit a Statement of Support in response to the amendment Oakland has now made.

**II. Statement of Support**

Oakland Power's September 25, 2023 filing, which amends Article 7 of the RMR Agreement, reflects the Settlement terms, and the CAISO therefore supports the amended filing.

Respectfully submitted,

/s/ Mary Anne Sullivan

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