

September 7, 2022

The Honorable Jennifer Granholm
Secretary of Energy
United States Department of Energy
1000 Independence Ave, SW
Washington DC 20585

RE: Request for Modification of Emergency Order Pursuant to Section 202(c) of the Federal Power Act

Dear Secretary Granholm:

Pursuant to Section 202(c) of the Federal Power Act (FPA),¹ and the Department of Energy (DOE) Administrative Procedures and Sanctions,² the California Independent System Operator Corporation (the CAISO)³ requests the Secretary of Energy modify the Section 202(c) emergency order issued to the CAISO on September 2, 2022. Modifying this emergency order will mitigate the risk of electricity supply disruptions in the face of extreme heat.

The CAISO requests DOE modify its September 2, 2022 emergency order to add two units at Calpine's Greenleaf Unit 1 site in Yuba City, California to the list of covered resources, subject to the conditions set forth in DOE's emergency order. The units at the Greenleaf site are General Electric TM2500 aero-derivative gas turbine generators. Each unit has a nameplate capacity of approximately 30 MW.⁴

On information and belief, Calpine's water injection pump failed at these units on September 6, 2022. Operation of these units without the water injection pump could cause exceedance of the units' permitted emissions limits, and thus could result in suspension of their operation absent the issuance of an emergency order directing their operation during specified conditions.

¹ 16 U.S.C. § 824a(c).

² 10 C.F.R. Part 205, Subpart W.

³ The CAISO is a non-profit public benefit corporation organized under the laws of the State of California. The CAISO is a balancing authority responsible for the reliable operation of the electric grid comprising the transmission systems of numerous utilities.

⁴ The coordinates of the units are as follows: Latitude: 39.0527451; Longitude: -121.69296. The coordinates of the switchyard are as follows Latitude: 39.0519994; Longitude: -121.6962465. The CAISO is informed and believes the nearest air monitoring stations to the units are the Greenleaf unit 1 site are as follows Yuba City EPA AQS Site ID: 61010003 NO₂, Ozone, PM₁₀, PM_{2.5}: Yuba City, 7.2 miles to the northeast CO, SO₂: Sacramento-Del Paso Manor, 35 miles to the southeast.

For the next several days, the CAISO continues to forecast high electric demand and supply deficiencies during peak demand hours. These deficiencies could lead to load curtailment at a time when Californians will need electricity for both health and safety. Modifying the emergency order to allow these units to operate during emergency conditions will help mitigate the risk the CAISO may need to curtail native load.

Consistent with the conditions of the September 2, 2022 emergency order, the CAISO requests DOE authorize the operation of the units at the Greenleaf unit 1 site under the following conditions:

- (1) the pendency of an Energy Emergency Alert - Level 2 condition or greater between the peak demand hours of 2:00 p.m. and 10:00 p.m. after exhausting all reasonably and practically available resources; or
- (2) a transmission emergency that requires operation of the covered resource to mitigate the risk of load curtailment during any operating hour.

The CAISO greatly appreciates DOE's expedited consideration of this request. Please do not hesitate to contact the undersigned if you have any questions or require additional information in order to act on this request.

Respectfully submitted,

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