

December 1, 2021

Via Electronic Mail

Mr. Kenneth Buell
Emergency Response and Recovery
Infrastructure Security & Energy Restoration Division
Cybersecurity, Energy Security, and Emergency Response
U.S. Department of Energy
1E-278, 1000 Independence Ave SW
Washington, DC 20585
kenneth.buell@hq.doe.gov

Ms. Tertia Speiser
Emergency Response and Recovery
Infrastructure Security & Energy Restoration Division
Cybersecurity, Energy Security, and Emergency Response
U.S. Department of Energy
1E-278, 1000 Independence Ave SW
Washington, DC 20585
tertia.speiser@hq.doe.gov

Cybersecurity, Energy Security, and Emergency Response ceser@hq.doe.gov

Re: September 10, 2021 Emergency Order issued under Federal Power Act Section 202(c)

Interim Report of the California Independent System Operator Corporation

Dear Mr. Buell and Ms. Speiser:

The California Independent System Operator Corporation (CAISO) submits this interim report pursuant to the requirements of ordering paragraphs D and E of the September 10, 2021 Emergency Order issued by the Department of Energy (DOE) under Federal Power Act Section 202(c). DOE's Emergency Order authorized the CAISO to direct operation of specified electric generating facilities (Covered Resources) above permitted limits under certain emergency conditions for the period between September 10, 2021 up and including November 9, 2021.¹ The Emergency Order also

¹ DOE's Emergency Order applied to units at the following Covered Resources: Midway Sunset Cogeneration Facility in Fellows, California; the Alamitos Energy Center in Long Beach, California; the Huntington Beach Energy Project in Huntington Beach, California; the Walnut Creek Energy Park in the City of Industry, California; Greenleaf Unit 1 in Yuba City, California; and the Roseville Energy Park in Roseville, California.

Mr. Kenneth Buell
Ms. Tertia Speiser
U.S. Department of Energy
December 1, 2021
Page 2

California Independent System Operator Corporation

authorized the CAISO to direct limited testing or synchronization of a subset of the Covered Resources for the period between September 10, 2021 up and including November 9, 2021.

During the period the Emergency Order was in effect, the CAISO did not direct the Covered Resources to operate to meet emergency conditions. The CAISO did direct limited testing and/or commissioning activities by the following Covered Resources: Midway Sunset Generating Facility, new units at the Greenleaf unit 1 site, and new units at the Roseville Energy Center. Consistent with DOE's Emergency Order, this interim report contains information collected by the CAISO from operators of the Covered Resources regarding their hours or operations, permit terms the Covered Resources units exceeded and the manner in which such exceedance occurred (Exhibits A-1 through F-2). This information also includes emission data and other information requested by DOE regarding the Covered Resource units. For the Covered Resources at the Greenleaf unit 1 site and new units at the Roseville Energy Center, emission data reflects derived values during commissioning activities as opposed to hourly data.

The CAISO's interim report also describes (Exhibit G-1) the CAISO's efforts to comply with DOE's directive that the CAISO inform all affected communities where all Covered Resources operate that DOE issued the Emergency Order.

Finally, this interim report includes a description (Exhibit H-1) prepared by the California Air Resources Board of information it has obtained in connection with the development and implementation of the plan to mitigate the effects of additional emissions authorized by the July 30, 2021 proclamation as well as copies of this information (Exhibits H-2 through H-6).

The CAISO includes a key to the exhibits contained in this interim report. The CAISO plans submit a final report on or before January 7, 2022 to supplement this interim report or confirm that the CAISO has no updates.

Please do not hesitate to contact me at 916.673.67797 or aulmer@casio.com with any questions

Respectfully submitted,

/s/ Andrew Ulmer

Assistant General Counsel

cc: Mr. Christopher Lawrence (DOE) christopher.lawrence@hq.doe.gov
Katherine Konieczny, Esq. (DOE) katherine.konieczny@hq.doe.gov
James (JB) Tartar, Esq. (DOE) james.tarter@hq.doe.gov

Key to Exhibits

Exhibit	Description
Exhibit A-1	Email RE: CAISO/DOE Data Request - Midway Sunset Cogeneration Facility Unit C dated November 17, 2021
Exhibit A-2	DOE 202(c) Emergency Order Midway Sunset Cogeneration Data Unit C Test Run 10_16_2021
Exhibit B-1	Copy of AES AEC CAISO DOE Emergency Order Data Request_11-19-2021
Exhibit C-1	Copy of AES HBEP CAISO DOE Emergency Order Data Request_fnl
Exhibit D-1	Email RE: CAISO/DOE Data Request - Walnut Creek Energy Park
Exhibit D-2	Copy of Walnut Creek Permit Limits_Compliance Demonstration_Sept 10-Nov 9 2021_11232021
Exhibit E-1	2021-11-23_Letter_to_CAISO_re_DOE_Waiver_Data_Request_FINAL.docx
Exhibit E-2	Source Test Report, 2021 Initial Compliance Test, GE Gas Power Systems, Calpine Green Leaf 1 Yuba City, California

Exhibit	Description
Exhibit E-3	Copy of GL1_UnitA - Monthly Emissions Report_October-2021
Exhibit E-4	Copy of GL1_UnitB - Monthly Emissions Report_October-2021
Exhibit E-5	Copy of GL1_UnitA - Monthly Emissions Report_September-2021
Exhibit E-6	Copy of GL1_UnitB - Monthly Emissions Report_September-2021
Exhibit F-1	Email RE CAISODOE Data Request - Roseville Energy Park
Exhibit F-2	Copy of GE TM2500 Initial CT Run Times and Emission Calcs ROSE FINAL
Exhibit G-1	CAISO overview of outreach efforts
Exhibit H-1	CARB description of plan to mitigate the effects of additional emissions

Exhibit	Description
Exhibit H-2	^N13005L Authority to Construct - Final District Review
Exhibit H-3	AC-REPR-21C_R1 [Authority to Construct / Temporary Permit to Operate issued by Placer County Air Pollution Control District for Roseville Combustion Turbine Generator #3]
Exhibit H-4	AC-REPR-21D_R1 [Authority to Construct / Temporary Permit to Operate issued by Placer County Air Pollution Control District for Roseville Combustion Turbine Generator #4]
Exhibit H-5	Greenleaf 1_Monthly On-Time Report
Exhibit H-6	Copy of Placer Initial CT Run Times (all hours)