

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 Extension 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 find an electric reliability emergency is continuing within the State of California that requires intervention, in the form of extending the Section 202(c) emergency order issued to the CAISO on September 2, 2022. Extending this emergency order will mitigate the risk of electricity supply disruptions resulting from extreme heat.

The CAISO respectfully requests that the Secretary extend the emergency order issued by DOE on Friday, September 2, 2022 through Monday September 12, 2022. The CAISO agrees to the conditions established in DOE's September 2, 2022 order during this period of extension.

California is experiencing extreme heat, which the CAISO forecasts to continue through at least September 9, 2022. The National Weather Service has issued excessive heat warnings for northern and southern parts of California through September 9, 2022.⁴ During this extreme heat, the threat of wildfire to the reliable operation of the bulk power system remains significant, and drought conditions are affecting the availability of hydroelectric power. To help mitigate adverse conditions that

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 More information is available on the National Weather Service website: <https://www.weather.gov/>

might arise from the heat event, the CAISO requests the Secretary extend the effectiveness of DOE's September 2, 2022 order through September 12, 2022

On September 6, 2022, demand on the CAISO system exceeded 50,000 MW and the CAISO experienced Energy Emergency Level-3 conditions. For the next several days, the CAISO continues to forecast high electric demand and supply deficiencies. These deficiencies could lead to load curtailment at a time when Californians will need electricity for both health and safety. Extended and excessive heat as well as wildfire remain significant variables for electric grid reliability in California and other western states and could exacerbate electric grid reliability issues at any time. Ambient conditions facing generating facilities are causing de-rates at some units and forcing other units offline. Wildfire threats arising from the extreme heat event are unpredictable and could force transmission and resources out of service. For all of these reasons, the CAISO believes it is prudent to request an extension of the emergency order through September 12, 2022.

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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