



Jim Detmers  
Vice President, Operations

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BAY AREA AIR QUALITY  
MANAGEMENT DISTRICT

August 31, 2009

Via Email

Weyman Lee, P.E., Senior Air Quality Engineer  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109

**Re: Draft Prevention of Significant Deterioration Permit for Russell City  
Energy Center**

Dear Mr. Lee:

I am writing on behalf of the California Independent System Operator (ISO) to comment on the request for a permit for Russell City Energy Center (RCEC).

**Brief Statement of the ISO's Qualifications**

The ISO is a nonprofit public benefit organization that operates the state's electric transmission grid, providing open and non-discriminatory access supported by a competitive energy market and comprehensive planning efforts. Together with more than 90 client organizations, the ISO is dedicated to the continual development and reliable operation of a modern grid that operates at the least cost for the benefit of all consumers.

**Description of the ISO's Support for this Project**

CAISO is encouraged by plants such as RCEC which help ensure the reliable and efficient delivery of power to hundreds of thousands of consumers in the Bay Area. In addition to the environmental benefits of the plant's high efficiency and use of recycled water for cooling, RCEC provides a flexible and fully dispatchable facility that will assist with successful integration of California's ambitious renewable portfolio.

In addition to its energy production and renewable integration benefits, this plant and the interconnection facilities that will be built to support its output will provide substantial voltage support to the grid, and will add enhanced delivery capability to the constrained San Francisco Peninsula.

The ISO urges you to consider these important benefits in your review of RCEC's application for a Prevention of Significant Deterioration permit.

Sincerely yours,

Jim Detmers  
Vice President, Operations