

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

**San Diego Gas and Electric Company )**

**Docket No. ER12-630-000**

**MOTION TO INTERVENE AND SUPPORTING COMMENTS OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (Commission), 18 C.F.R. § 385.214, and the Commission's December 19, 2011 Combined Notice of Filings, the California Independent System Operator Corporation (ISO) submits this motion to intervene and supporting comments in the above captioned proceeding.

**I. DESCRIPTION OF THE PROCEEDING**

On December 16, 2011, San Diego Gas and Electric Company. (SDG&E) submitted a proposed Black Start Agreement between SDG&E as a Participating Transmission Owner, the ISO, and SDG&E (Black Start Generator). The purpose of the agreement is to govern the provision of the ancillary service of Black Start capability from the Black Start Generating Units to ISO.

Upon execution of the Black Start Agreement, ISO will include the Black Start Generating Units in its grid restoration plan. The Parties have agreed to set the reservation fee for Black Start capability at zero. However, in the event of dispatch for Black Start, Black Start Generator may enter into market transactions and retain compensation for the delivery of energy or ancillary services. SDG&E also requests waiver of any applicable rules or regulations, including waiver of the Commission's notice requirements set forth in Section 35.3 to allow the Black Start Agreement to

become effective on the date that the Commission issues an order accepting this filing. Good cause exists to grant this waiver because the immediate provision of Black Start capability under the Black Start Agreement will foster reliability by enhancing ISO's grid restoration plan. By its notice issued December 19, 2011, the Commission established January 6, 2012 as the date motions to intervene are to be filed in the above-captioned proceeding.

## **II. DESCRIPTION OF THE ISO AND COMMUNICATIONS**

The ISO is a non-profit public benefit corporation organized under the laws of the State of California with its principal place of business at 250 Outcropping Way, Folsom, CA 95630. The ISO is the Balancing Authority Area operator responsible for the reliable operation of the electric grid comprising the transmission systems of a number of utilities, including SDG&E, as well as the coordination of the ancillary services and real-time electricity markets in California.

The ISO requests that all communications and notices concerning this motion and these proceedings be provided to:

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## **III. THE ISO'S INTEREST**

Black Start services to the ISO are provided through the proposed Black Start Agreement referenced herein. Black Start capability is an important and necessary

reliability service. As the Balancing Authority Area operator and as a party to the proposed Black Start Agreement, the ISO has a unique interest in any Commission proceeding that affects the agreement. Accordingly, the ISO has a direct and substantial interest in this proceeding and requests that it be permitted to intervene. Because no other party can adequately represent the ISO's interests in this proceeding, the ISO's intervention is in the public interest and should be granted.

#### **IV. COMMENTS**

The ISO supports the proposed Black Start Agreement and urges the Commission to accept it as requested by SDG&E.

#### **V. CONCLUSION**

For the foregoing reasons, the ISO respectfully requests that the Commission grant this Motion to Intervene and make the ISO a party in the above-caption proceeding with full rights of participation.

Dated: January 6, 2012

Respectfully submitted

**By: /s/ Grace M. Arupo**

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**CERTIFICATE OF SERVICE**

I hereby certify that I have, this 6th day of January, 2012, caused to be served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

*Is/ Anna Pascuzzo*

Anna Pascuzzo