

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of the San Diego Gas Electric Company (U 902 E) for Authority to Partially Fill the Local Capacity Requirement Need Identified in D.14-03-004 and Enter into a Purchase Power Tolling Agreement with Carlsbad Energy Center, LLC

Application 14-07-009
(Filed July 21, 2014)

**MOTION OF THE CALIFORNIA INDEPENDENT
SYSTEM OPERATOR CORPORATION TO BECOME A PARTY**

Pursuant to Commission Rules of Practice and Procedure 1.4(a)(4) and 11.1, the California Independent System Operator Corporation (CAISO) hereby moves for leave to become a party to this proceeding.

The CAISO is a California public benefit company charged with reliably planning and operating the high voltage transmission system for its participating transmission owners (including San Diego Gas & Electric Company [SDG&E]) and running a day-ahead and real-time wholesale energy market. The CAISO has been an active participant in many Commission proceedings, including R.12-03-014, the long term procurement proceeding in which the Track 4 decision, D.14-03-004, was released earlier this year.

In R.12-03-014 Track 4, the CAISO presented studies of the SDG&E/SCE local capacity areas showing an urgent need for additional resources in light of the SONGS retirement in 2012 and the once-through-cooling environmental restrictions that will cause certain coastal resources to retire or repower, such as the year-end 2017 compliance deadline for the 946 MW Encina Power Plant. With the instant application, SDG&E seeks approval of a purchase power tolling agreement (PPTA) that can partially fill this local need on a timely basis. Given its location and

operational characteristics, the Carlsbad Energy Center would be a highly effective resource for addressing the local need identified in the Track 4 decision, which included approval for both conventional and preferred resources.

If this motion is granted, the CAISO intends to participate fully in this proceeding. Specifically, several parties have questioned whether a resource such as the Carlsbad Energy Center is needed in light of the transmission projects identified in the 2013-2014 transmission plan, approved by the CAISO Governing Board in March 2014.¹ The CAISO is uniquely situated to address this and other questions regarding the transmission plan and the assumptions that went into the studies supporting the transmission solutions approved by the Governing Board.² The CAISO notes that the need for resources in the SDG&E local area authorized by D.14-03-014 was not reduced by the transmission projects approved in the transmission plan.

The CAISO requests that all correspondence, pleadings, notices, orders, rulings and other communications concerning this proceeding be provided to the following:

Judith B. Sanders
Senior Counsel
Jordan Pinjuv
Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630
T – 916-351-4429
F – 916-608-7222
jsanders@caiso.com
jpinjuv@caiso.com

¹ See, e.g. ORA protest, pp. 3-5; Sierra Club/CEJA protest, pp. 2-3.

² The CAISO's transmission planning studies assumed a certain amount of new thermal resources in the SONGS local area, consistent with the Commission's findings in D.14-03-014.

For the reasons stated above, the CAISO asks that the Commission grant its motion for party status.

Respectfully submitted,

By: /s/ Judith B. Sanders

Roger E. Collanton

General Counsel

Anthony Ivancovich

Deputy General Counsel

Anna A. McKenna

Assistant General Counsel

Judith B. Sanders

Senior Counsel

Jordan Pinjuv

Counsel

California Independent System

Operator Corporation

250 Outcropping Way

Folsom, CA 95630

T – 916-608-7143

F – 916-608-7222

jsanders@caiso.com

jpinjuv@caiso.com

Dated: August 28, 2014