

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

Application of Southern California Gas Company (U 904 G) and San Diego Gas & Electric Company (U 902 G) for Low Operational Flow Order and Emergency Flow Order Requirements

Application 14-06-021
(Filed June 27, 2014)

Triennial Cost Allocation Proceeding Phase 1 Application of Southern California Gas Company (U 904 G) and San Diego Gas & Electric Company (U 902 G) for Authority to Revise their Natural Gas Rates Effective January 1, 2016

Application 14-12-017
(Filed December 18, 2014)

CONSOLIDATED

**MOTION FOR PARTY STATUS OF
THE DEPARTMENT OF MARKET MONITORING OF THE CALIFORNIA
INDEPENDENT SYSTEM OPERATOR CORPORATION**

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

As the Independent Market Monitor of the CAISO, the DMM's mission is specified in the CAISO tariff is as follows:

To provide independent oversight and analysis of the CAISO Markets for the protection of consumers and Market Participants by the identification and reporting of market design flaws, potential market rule violations, and market power abuses.¹

¹ CAISO Tariff Appendix P, Section 1.2.

http://www.caiso.com/Documents/AppendixP_CAISODepartmentOfMarketMonitoring_asof_Apr1_2017.pdf.

The CAISO tariff states that “DMM shall review existing and proposed market rules, tariff provisions, and market design elements and recommend proposed rule and tariff changes to the CAISO, the CAISO Governing Board, FERC staff, the California Public Utilities Commission, Market Participants, and other interested entities.”² As this proceeding involves proposed rule changes under CPUC jurisdiction that affect the CAISO’s markets and consumers, it implicates matters within DMM’s purview. The DMM closely monitors the CAISO’s electric markets and routinely analyzes the impact of gas market conditions on California’s electric markets. As the Independent Market Monitor of the CAISO, the DMM’s views are independent and distinct from those of the CAISO. Thus, the DMM has a significant and unique interest in this proceeding, and can offer valuable experience to the Commission.

For the purpose of receipt of all correspondence, pleadings, orders and notices in this proceeding, the DMM respectfully requests that the following DMM representative be placed on the service list as a “party”:

Amelia Blanke, Ph.D.
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See also FERC Order 719, at p. 188, where the functions of a Market Monitor include: “evaluating existing and proposed market rules, tariff provisions and market design elements, and recommending proposed rule and tariff changes not only to the RTO or ISO, but also to the Commission’s Office of Energy Market Regulation staff and to other interested entities [...]” <https://www.ferc.gov/whats-new/comm-meet/2008/101608/E-1.pdf>

² CAISO Tariff Appendix P, Section 5.1.

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

Respectfully submitted,

By: /s/ Amelia Blanke

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Independent Market Monitor for the California
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Dated: August 30, 2018