

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

**Southern California Edison
Company**

Docket No. ER13-1995-000

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

I. Introduction

The California Independent System Operator Corporation (“ISO”) submits this motion to intervene in this proceeding, which concerns an unexecuted large generator interconnection agreement by and between the ISO, Southern California Edison Company (“SCE”), as a participating transmission owner, and Watson Cogeneration Company (“Watson”), as an interconnection customer.¹

II. Motion to Intervene

The ISO is a non-profit public benefit corporation organized under the laws of the State of California, with a principal place of business at 250 Outcropping Way, Folsom, California. The ISO is an independent transmission system operator and the balancing authority responsible for reliable operation of the grid comprising the transmission systems of its participating transmission owners, including SCE. The ISO also operates energy and ancillary services markets within its balancing authority area.

SCE’s filing includes an unexecuted large generator interconnection agreement by and between the ISO, SCE, as participating transmission owner, and Watson, as the interconnection customer. Accordingly, the ISO has a direct and

¹ The ISO submits this filing pursuant to Rule 212 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. §§ 385.212.

substantial interest in this proceeding and requests that it be permitted to intervene with full rights of a party. 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.

III. Comments

The ISO tariff includes provisions that apply to combined heat and power resources, such as Watson, and provide a higher level of protection against curtailment under certain circumstances. These tariff provisions recognize that combined heat and power resources, such as Watson, have obligations to their industrial hosts.

Specifically, ISO tariff section 4.6.3.4.4 limits the ISO's ability to curtail such resources below a minimum operating limit unless there is a system emergency.²

The ISO has included such provisions in the ISO tariff to encourage the transition of qualifying facilities from ISO tariff exempt resources to ISO tariff compliant resources that offer any capacity not dedicated to their industrial hosts into the ISO's market as flexible capacity. Most recently, the ISO amended the tariff to continue the regulatory must-take scheduling priority that exempt qualifying facilities have been entitled to in order to provide a higher scheduling priority to the capacity dedicated to the host industrial process. These tariff provisions are set forth in ISO tariff section 4.6.10.

IV. Communications

Please address all communications concerning this proceeding to the following persons:

² See also *Pro Forma* Net-Scheduled Participating Generator Agreement, <http://www.caiso.com/Documents/NetScheduledParticipatingGeneratorAgreement.pdf>, which is available to qualifying facilities and combined heat and power resources.

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V. Conclusion

The ISO respectfully requests that the Commission grant its motion to intervene in the captioned proceeding and allow the ISO to participate in the proceeding with full rights as a party thereto.

Dated: July 26, 2013

Respectfully submitted,

By: /s/ Sidney Davies

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³ 18 C.F.R. § 385.203(b)(3).

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all parties listed on the official service list in the captioned proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, CA, this 26th day of July, 2013.

/s/ Sarah Garcia
Sarah Garcia