

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

**California Independent System            )       Docket No. EL18-177-000  
Operator Corporation                    )**

**MOTION TO INTERVENE  
OF THE DEPARTMENT OF MARKET MONITORING  
OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“FERC” or “Commission”), 18 C.F.R. §§385.212 & 214, the Department of Market Monitoring (DMM), acting in its capacity as the Independent Market Monitor for the California Independent System Operator Corporation (“CAISO”), submits this motion to intervene in the above captioned proceeding.

DMM respectfully requests that the Commission afford due consideration to this motion to intervene, and afford DMM full rights as a party to this proceeding. The mission of DMM – like that of all Independent Market Monitors – 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.<sup>1</sup>

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<sup>1</sup> CAISO Tariff Appendix P, Section 1.2.  
[http://www.caiso.com/Documents/AppendixP\\_CAISODepartmentOfMarketMonitoring\\_asof\\_Apr1\\_2017.pdf](http://www.caiso.com/Documents/AppendixP_CAISODepartmentOfMarketMonitoring_asof_Apr1_2017.pdf).

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>

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.”<sup>2</sup> As this proceeding involves issues which can affect the efficiency and the justness and reasonableness of the ISO’s markets, it implicates matters within DMM’s purview.

DMM requests that all correspondence and other communications concerning this filing be served upon the following:

Eric Hildebrandt, Ph.D.  
Executive Director, Market Monitoring  
Ryan Kurlinski  
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Respectfully submitted,

**/s/ Eric Hildebrandt**

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<sup>2</sup> CAISO Tariff Appendix P, Section 5.1.

Tel: 916-608-7123

Independent Market Monitor for the California  
Independent System Operator

Dated: August 24, 2018

## CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service lists in the above-referenced 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, California this 24<sup>th</sup> day of August, 2018.

*Anna Pascuzzo*

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