

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

Dynergy Oakland, LLC

Docket No. ER15-274

**MOTION TO INTERVENE AND 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 October 31, 2014 Combined Notice of Filings, the California Independent System Operator Corporation (“CAISO”) submits this motion to intervene and comments in the above captioned proceeding. In support thereof, the CAISO states as follows:

I. DESCRIPTION OF THE PROCEEDING

On October 31, 2014, Dynergy Oakland, LLC (Dynergy) submitted, pursuant to Section 205 of the Federal Power Act,¹ its annual filing proposing revisions to its Reliability Must-Run (“RMR”) Service Agreement (“RMR Agreement”) with the CAISO along with its annual informational filing to support its proposed changes to the Annual Fixed Revenue Requirement. This annual filing, made in response to the CAISO’s notice to Dynergy to extend the RMR Agreement for the 2015 contract year, is required by Section 4.11 of the RMR Agreement.

By its notice issued October 31, 2014, the Commission established November 21, 2014, as the date motions to intervene are to be filed in the above-captioned proceeding.

¹ 16 U.S.C. §§ 824d and 824e.

II. DESCRIPTION OF THE CAISO AND COMMUNICATIONS

The CAISO 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 CAISO is the Balancing Authority Area Operator responsible for the reliable operation of the electric grid consisting of the transmission systems of a number of utilities, including Pacific Gas & Electric Company (PG&E), as well as the coordination of the day-ahead and real-time energy and ancillary services markets in California.

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

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III. THE CAISO'S INTEREST

As the Balancing Authority Area Operator responsible for maintaining reliability of PG&E's transmission system that is part of the CAISO controlled grid and as the counter party to the RMR Agreement, the CAISO has a unique interest in any Commission proceeding that affects this RMR Agreement. Accordingly, the CAISO has a direct and 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 CAISO's interests in this proceeding, the CAISO's intervention is in the public interest and should be granted.

IV. COMMENTS

The CAISO intervenes in support of Dynegey's annual filing. The CAISO has reviewed Dynegey's proposed changes in rates, terms and conditions of the RMR contract for the 2015 contract year and agrees they are consistent with the RMR Agreement and are reasonable. The CAISO urges the Commission to accept the changes effective as of January 1, 2015 as requested by Dynegey.

V. CONCLUSION

For the foregoing reasons, the CAISO respectfully requests that the Commission grant this motion to intervene and make the CAISO a party to the above-captioned proceeding with full rights of participation.

Respectfully submitted,

By: /s/ Sidney L. Mannheim

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Counsel for California Independent
System Operator Corporation

Dated: November 21, 2014

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 21st day of November 2014.

Anna Pascuzzo

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