

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

Pacific Gas and Electric Company

Docket No. ER15-227-000

**MOTION TO INTERVENE OUT-OF-TIME OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

I. Introduction

The California Independent System Operator Corporation (the CAISO) submits this motion to intervene out-of-time in this proceeding.

On October 29, 2014, Pacific Gas and Electric Company (PG&E) submitted two non-conforming large generator interconnection agreements in the captioned docket, with a requested effective date of January 1, 2015. In that filing, PG&E explained that these agreements, among others, provide for the continued interconnection of the State of California Department of Water Resources State Water Project's (CDWR) generation to PG&E's transmission system from the soon-to-be-terminated 1982 Comprehensive Agreement between CDWR and PG&E.

The CAISO submitted concurrence tariff records to PG&E's filing of the non-conforming service agreements in Docket No. ER15-322-000.

By its Notice issued October 29, 2014, the Commission established November 19, 2014, as the date motions to intervene were to be filed in the above-captioned proceeding.

II. Motion to Intervene Out-of-Time

The CAISO 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 CAISO is an independent transmission system operator operating the transmission systems of its participating transmission owners. The CAISO is a balancing authority and coordinates the ancillary services and electricity markets within its balancing authority area.

PG&E's filing includes two proposed non-conforming large generator interconnection agreements by and between the CAISO, PG&E and CDWR. 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.

The CAISO originally did not intervene in this docket because of its concurrence filing in Docket No. ER15-322-000. However, because the Transmission Agency of Northern California (TANC) has filed a protest and motion to consolidate in this docket and Docket Nos. ER15-322-000 and ER15-223 (not consolidated),¹ good cause exists to allow the CAISO to intervene out of time. The CAISO has already timely intervened in the other two dockets, and its intervention here will avoid confusion.

¹ *Pacific Gas and Electric Co.*, Protest, Request for Suspension, Hearing and Settlement Procedures and Motion for Consolidation of the Transmission Agency of Northern California, Docket Nos. ER15-223-000, ER15-227-000, ER15-227-001, ER15-227-002, ER15-322-000 (not consolidated) (Nov. 20, 2014).

III. Communications

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

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* Individuals designated for service pursuant to Rule 203(b)(3).²

IV. Conclusion

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

Respectfully submitted,

/s/ William H. Weaver
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Attorneys for the California Independent
System Operator Corporation

Dated: November 25, 2014

² 18 C.F.R. § 385.203(b)(3).

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all of the parties listed on the official service list for the captioned proceeding, 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 25th day of November 2014.

/s/ Sarah Garcia
Sarah Garcia