

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

San Diego Gas and Electric Company

Docket No. ER16-2600

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

The California Independent System Operator Corporation (“CAISO”) respectfully submits this motion to intervene and comments on the Notice of Cancellation filed on September 16, 2016, by San Diego Gas & Electric Company (“SDG&E”).¹ SDG&E’s Notice of Cancellation seeks to cancel the Standard Large Generator Interconnection Agreement (“LGIA”) among SDG&E, the CAISO, and the interconnection customer, Bull Moose Energy, LLC (“BME”). The CAISO generally supports SDG&E’s cancelling the LGIA for the reasons set forth in the Notice of Cancellation. However, since SDG&E filed the Notice of Cancellation, BME has represented to the CAISO and SDG&E that recent developments will allow BME to make meaningful steps toward executing the LGIA amendment, posting its required financial security, and commencing commercial operation. In the event BME does not achieve the prescribed milestones described below by October 28, 2016, and SDG&E does not withdraw the Notice of Cancellation prior to its requested effective date, the CAISO respectfully requests that the Commission approve the cancellation. The CAISO is authorized to state that SDG&E is aligned with the CAISO on this approach.

¹ The CAISO moves to intervene and submits these comments pursuant to Rules 212 and 214 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. §§ 385.212, 385.214 (2016).

I. MOTION TO INTERVENE

The CAISO respectfully requests that the Commission allow it to intervene. The CAISO is a party to the LGIA and has worked continuously with SDG&E and BME toward resolving BME's request to interconnect to the CAISO controlled grid. As a result, the CAISO has a direct and substantial interest in the proceeding. Because no other party can adequately represent the CAISO's interests in the proceeding, the CAISO's intervention is in the public interest, and the Commission should grant the intervention.

II. COMMENTS

The CAISO concurs with SDG&E's representations regarding BME's consistent lingering in the interconnection process without meaningful progress. The CAISO reiterates SDG&E's concern that "BME has employed a strategy of providing half-responses, or none at all, to delay execution of an [LGIA] amendment and hence the financial commitments that would then be required" to commence construction and interconnection.² BME is in breach of its LGIA and has employed the same strategy in response to the CAISO's outreach and efforts. Based on BME's recalcitrance, the CAISO supported SDG&E's decision to file the Notice of Cancellation of BME's LGIA.

After SDG&E filed the Notice of Cancellation, BME notified the parties that it has secured a power purchase agreement, financing, and necessary permits for its project. As such, BME is now willing to execute the necessary LGIA amendment and post the required interconnection financial security. Because the CAISO and SDG&E are

² Notice of Cancellation at 2.

committed to cooperating with viable projects, the CAISO and SDG&E are willing to provide a final opportunity to BME to comply with its outstanding requirements.

However, to ensure that this is not just another effort to delay the process, the CAISO and SDG&E have agreed that SDG&E will withdraw the Notice of Cancellation only if BME executes the required LGIA amendment by October 21, 2016, and submits the required interconnection financial security by October 28, 2016. These positive, concrete steps will provide the CAISO and SDG&E with sufficient assurance that BME is making meaningful progress toward commercial operation and is not merely continuing to linger in the interconnection queue. If BME fails to take these steps and SDG&E does not withdraw the Notice of Cancellation, the CAISO requests that the Commission approve the Cancellation of the LGIA as filed.

Respectfully submitted,

By: /s/ William H. Weaver

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Dated: October 7, 2016

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in 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 7th day of October, 2016.

/s/ Grace Clark
Grace Clark