

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

PacifiCorp)
)

Docket No. ER14-1578-000
Docket No. ER14-2544-000

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

The California Independent System Operator Corporation (“CAISO”) respectfully moves to intervene in Docket No. ER14-2544-000 and files its answer to and comments on PacifiCorp's motion, filed on September 16, 2014, to change the requested effective date for certain provisions of its Open Access Transmission Tariff applicable to the Energy Imbalance Market.¹ The CAISO supports PacifiCorp's motion.

The CAISO is the market operator of the Energy Imbalance Market associated with PacifiCorp’s motion. As such, the CAISO has a direct and substantial interest in Docket No. ER14-2544-000 (as well as in Docket No. ER14-1578-000, to which the CAISO is already 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.

On the same date that PacifiCorp filed its motion, the CAISO submitted a similar motion to change the requested effective date of certain provisions of the

¹ The CAISO makes this filing pursuant to Rules 213 and 214 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. §§ 385.213 and 385.214 (2014).

CAISO tariff applicable to the Energy Imbalance Market.² These motions work together to implement a parallel, non-binding production environment for the Energy Imbalance Market on October 1, 2014, followed by full activation on November 1, 2014. PacifiCorp and the CAISO have determined that moving forward with implementation of the Energy Imbalance Market in this manner would be prudent. Key stakeholders support this action, and the CAISO is not aware of any opposition.³

Accordingly, the CAISO requests that the Commission grant the CAISO's motion to intervene in ER14-2544-000 and grant PacifiCorp's motion to change the effective date of certain OATT provisions as requested.

² See, Motion to Modify Effective Date of Tariff Provisions, Docket Nos. ER14-1386-003 *et al.* (requesting a change of effective date consistent with the PacifiCorp motion).

³ See, *e.g.*, Memorandum, Decision on Implementation of the Energy Imbalance Market and Briefing on Full Network Model Expansion, September 15, 2014 (proposing implementation of a parallel, non-binding production environment on October 1, 2014 with full implementation on November 1, 2014, which was supported by public comments from PacifiCorp, Pacific Gas and Electric Company, Southern California Edison Company, and the Natural Resources Defense Counsel at the CAISO Board of Governors meeting on September 18, 2014, and supported by written comments submitted by the Bonneville Power Administration, and is available at: http://www.aiso.com/Documents/Decision-EIM_Implementation_BriefingFullNetworkModelEnhancements-Sept2014.pdf).

Respectfully submitted

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Dated: September 19, 2014

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon all of the parties listed on the official service lists for 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 Washington, DC this 19th day of September 2014.

/s/ Daniel Klein
Daniel Klein