

Deliverability Study activities that ISO will perform for the ISO's own Interconnection Customers under the ISO's Generation Interconnection Process ("GIP").² SDG&E's letter further explained that SDG&E would file revisions to reflect the resolution of the timing issues that it worked out with the ISO. SDG&E requested that the Commission not act on the December 28 filing until after the revision was filed and noticed, so as to provide interested parties further opportunity to intervene and comment.

SDG&E filed its revisions on February 25, 2011, which the Commission designated as Docket No. ER11-2948-000 ("Revision Filing"). The Commission's February 25, 2011 notice of filing set March 18, 2011 as the date comments and interventions.

II. COMMUNICATIONS

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

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² ISO Appendix Y, effective December 19, 2011, accessible on the ISO's website at <http://www.caiso.com/2872/2872862b51c40.pdf>.

III. MOTION TO INTERVENE

The ISO 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, CA 95630. The ISO is the Balancing Authority Area operator responsible for the reliable operation of the electric grid comprising the transmission systems of a number of utilities, including Pacific Gas & Electric Co., SDG&E, Southern California Edison Company, the Cities of Vernon, Pasadena, Anaheim, Azusa, Banning, and Riverside, California, of Atlantic Path 15, LLC and Startrans IO, L.L.C. and, with regard to the Path 15 transmission lines in California, the Western Area Power Administration, Sierra Nevada Region. As the Balancing Authority, the ISO coordinates the ancillary services and electricity markets within its Balancing Authority Area.

The ISO operates under the terms of the ISO Tariff, which is on file with the Commission. A component of that tariff is the Generator Interconnection Procedures (“GIP”) mentioned above. As noted within SDG&E’s February 25 transmittal letter to its Revision Filing, there is an interrelation of activities with respect to SDG&E’s processing of its Distribution System interconnection requests under SDG&E’s procedures that are the subject of these proceedings and the ISO’s GIP. GIP Sections 6.4.2 and 8.3 provide that SDG&E interconnection customers can obtain an ISO determination as to what (if any) Delivery Network Upgrades to the ISO-Controlled Grid are required to allow the SDG&E interconnection customer’s generation facility to be deliverable to the aggregate of Load on the ISO-Controlled Grid. Accordingly, these GIP tariff provisions, together with SDG&E procedures,

provide for the ISO to conduct activities in furtherance of SDG&E's interconnection processes. As such, the ISO has an interest in these proceedings, and no other party can adequately represent the interests of the ISO in these proceedings.

IV. COMMENTS

As SDG&E has indicated to the Commission in the February 14 letter and February 25 Revision Filing, the ISO and SDG&E have conferred regarding the timing of deliverability study activities contemplated in SDG&E's WDAT and its interconnection provisions that are the subject of SDG&E's filings. The provisions as revised by the Revision Filing have addressed the ISO's main concerns. These concerns pertained to the ISO's desire and need that deliverability activities that the ISO performed for SDG&E's interconnection customers would be harmonized with the deliverability activities the ISO would perform for its own customers in the ISO's GIP cluster study process. As revised, the ISO supports SDG&E's proposal.

The ISO also agrees with SDG&E that it is important that SDG&E's proposed tariff provisions be made effective as of March 25, 2011, so that the ISO can include its part of the work related to deliverability requests from SDG&E's interconnection requests in the ISO's next Deliverability Study cycle, which is scheduled to begin in the second quarter of 2011.

The ISO also appreciates SDG&E's statement to the Commission in SDG&E's February 25th transmittal letter that SDG&E intends during 2011 to file further revisions to its WDAT and interconnection procedures to harmonize SDG&E's interconnection process with the ISO's GIP. We look forward to working with SDG&E in that effort.

V. CONCLUSION

As indicated by the foregoing, the ISO supports SDG&E's tariff provisions submitted in the December 28, 2010 and February 25, 2011 filings and SDG&E's request that the Commission accept the proposed provisions and proposed effective date.

Respectfully submitted,

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Dated: March 18, 2011

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in the above-captioned docket, in accordance with the requirements of Rule 2010 of the Commission Rules of Practice and Procedure (18 C.F.R. §385.2010).

Dated this 18th day of March, 2011 at Folsom, California.

/s/ Anna Pascuzzo

Anna Pascuzzo