

UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION

California State University-Channel Islands Site Authority ) Docket No. ER20-1708-000  
)

**MOTION TO INTERVENE OF THE DEPARTMENT OF MARKET MONITORING OF  
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“FERC” or “Commission”), 18 C.F.R. §§385.212 and 385.214, the Department of Market Monitoring (DMM), acting in its capacity as the Independent Market Monitor for the California Independent System Operator Corporation (“CAISO”), submits in the captioned proceeding this motion to intervene for the reasons discussed herein.

**I. MOTION TO INTERVENE**

DMM respectfully requests that the Commission afford due consideration to this motion to intervene, and afford DMM full rights as a party to this proceeding. The CAISO’s tariff describes the mission of DMM as follows:

To provide independent oversight and analysis of the CAISO Markets for the protection of consumers and Market Participants by the identification and reporting of market design flaws, potential market rule violations, and market power abuses.<sup>1</sup>

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<sup>1</sup> CAISO Tariff Appendix P, Section 1.2.  
[http://www.aiso.com/Documents/AppendixP\\_CAISODepartmentOfMarketMonitoring\\_asof\\_Apr1\\_2017.pdf](http://www.aiso.com/Documents/AppendixP_CAISODepartmentOfMarketMonitoring_asof_Apr1_2017.pdf).

See also FERC Order 719, at p. 188, where the functions of a Market Monitor include: “evaluating existing and proposed market rules, tariff provisions and market design elements, and recommending proposed rule and tariff changes not only to the RTO or ISO, but also to the Commission’s Office of Energy Market Regulation staff and to other interested entities [ ...]”

The CAISO tariff states that “DMM shall review existing and proposed market rules, tariff provisions, and market design elements and recommend proposed rule and tariff changes to the CAISO, the CAISO Governing Board, FERC staff, the California Public Utilities Commission, Market Participants, and other interested entities.”<sup>2</sup> As this proceeding involves RMR contract provisions with the potential to impact many facets of the CAISO market, this proceeding involves matters within DMM’s purview under the CAISO tariff.

Respectfully submitted,

**/s/ Eric Hildebrandt**

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Independent Market Monitor for the California  
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Dated: May 21, 2020

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<sup>2</sup> CAISO Tariff Appendix P, Section 5.1.

## 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, CA this 21<sup>st</sup> day of May, 2020.

*/s/ Candace McCown*  
Candace McCown