### BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

IN THE MATTER OF A COMMISSION	)	
INVESTIGATION INTO THE FEASIBILITY	)	
OF PUBLIC SERVICE COMPANY OF NEW	)	
MEXICO BECOMING A MEMBER OF THE	)	Case No. 17-00261-UT
SOUTHWEST POWER POOL	)	
	<b>)</b>	

## Motion to Intervene of the California Independent System Operator Corporation

The California Independent System Operator Corporation (ISO) pursuant to NMAC 1.2.2.23, respectfully files this motion to intervene as a party to this proceeding opened by the New Mexico Public Regulation Commission to investigate the feasibility, including an analysis of costs and benefits, of Public Service Company of New Mexico (PNM) becoming a member of the Southwest Power Pool (SPP), the western Energy Imbalance Market (western EIM), or another organization such as the Mountain West Transmission Group (MWTG). In support of this motion, the ISO states:

- 1. This proceeding concerns an inquiry into whether PNM should become a member of the western EIM. The ISO serves as the market operator for the western EIM and, as such, has a direct and substantial interest in the proceeding. Because no other party can adequately represent the ISO's interests in the proceeding, the Commission should grant ISO's intervention. In addition, given its role as the market operator of the western EIM, participation by the ISO in this proceeding is substantially in the public interest.
- 2. Pursuant to NMAC 1.2.2.10, the ISO requests service of all pleadings, orders, notices, and documents filed by any party in this proceeding and requests that the Commission expand the service list to include the following authorized

# representatives:

Andrew Ulmer
Director, Federal Regulatory Affairs
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630
Tel: (916) 608-7209

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The ISO respectfully requests to intervene and become a party to this proceeding, expand the service list, to receive all documents in this proceeding as requested.

Dated: November 21, 2017 Respectfully submitted,

Roger E. Collanton General Counsel John C. Anders

Assistant General Counsel

**Andrew Ulmer** 

Director, Federal Regulatory Affairs

California Independent System

Operator Corporation 250 Outcropping Way Folsom, CA 95630

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#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing *Motion to*Intervene of the California Independent System Operator Corporation, was sent via electronic mail on Tuesday, November 21, 2017, to the parties listed below:

e@gmail.com Blaber@sierraclub.org chandanalysis@gmail.com @swenergy.org earthlink.net ard.org h@nrdc.org @jasonmarks.com chie@sierraclub.org bq.gov cabq.gov @cabq.gov eskylawoffice.com eedsbeneaththesnow.com v77.com ty@newmexico.com outlook.com is@consultbai.com tecoenergy.com tecoenergy.com her-law.com @state.nm.us cha@state.nm.us unter@state.nm.us eadles@state.nm.us cker@state.nm.us vez@state.nm.us nolds@state.nm.us eCesare@state.nm.us @state.nm.us ba-Tercero@state.nm.us Sisneros@state.nm.us enbrock@state.nm.us ck@state.nm.us

Dated this 21st day of November, 2017 at Folsom, California.

California Independent System Operator Corporation

Grace Clark, Paralegal