

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

**GenOn Potrero, LLC**

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**Docket No. ER11-3549-000**

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

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. § 385.214, and the Commission’s May 12, 2011, combined notice of filings, the California Independent System Operator Corporation (“ISO”) submits this motion to intervene and comments in the above captioned proceeding. In support thereof, the ISO states as follows:

**I. DESCRIPTION OF THE PROCEEDING**

On May 11, 2011, GenOn Potrero, LLC (“Potrero”) submitted a notice of cancellation of its market-based tariff, FERC Electric Tariff, First Revised Volume No. 1. Potrero requests that the Commission waive its prior notice requirements and accept the proposed effective date of May 12, 2011. By its notice issued, May 12, 2011, the Commission established June 1, 2011 as the date by which comments and motions to intervene are to be filed in the above-captioned proceeding.

**II. DESCRIPTION OF THE CAISO AND COMMUNICATIONS**

The ISO is a non-profit public benefit corporation organized under the laws of the State of California with its 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 and Electric Company (“PG&E”), as well as the coordination of the ancillary services and real-time electricity markets in California.

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

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### **III. ISO’S INTEREST**

Potrero’s generating units are located within PG&E’s transmission systems. These facilities were needed historically to maintain the reliability of the ISO Controlled Grid. Prior to February 28, 2011, the Potrero units operated under a Reliability Must-Run (“RMR”) agreement with the ISO. As the Balancing Authority Area operator and as the counter party to the RMR agreement, the ISO has a unique interest in any Commission proceeding that affects. Accordingly, the ISO has a direct and substantial interest in this proceeding, and requests that it be permitted to intervene. Because no other party can adequately represent the ISO’s interests in this proceeding, the ISO’s intervention is in the public interest and should be granted.

#### **IV. COMMENTS**

As set forth in its notice of cancellation, the Potrero generating units retired as of February 28, 2011, concurrent with the termination of the RMR agreement. The ISO supports Potrero's filing, including the request for waiver of the prior notice requirement, so that the cancellation is effective as of May 12, 2011 as requested.

#### **V. CONCLUSION**

For the foregoing reasons, the ISO respectfully requests that the Commission grant this Motion to Intervene and make the ISO a party in the above-captioned proceeding with full rights of participation.

Dated: June 1, 2011

Respectfully submitted  
**By:/s/ Sidney Mannheim Davies**  
Nancy Saracino  
General Counsel  
Sidney Mannheim Davies  
Assistant General Counsel  
California Independent System  
Operator Corporation  
250 Outcropping Way  
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## **CERTIFICATE OF SERVICE**

I hereby certify that I have, this 1<sup>st</sup> day of June, 2011, caused to be served a copy of the forgoing document upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

*/s/ Anna Pascuzzo*  
Anna Pascuzzo