

to set the reservation fee for Black Start capability at zero. However, in the event of dispatch for Black Start, Orange Grove Energy may enter into market transactions and retain compensation for the delivery of energy or ancillary services. Orange Grove also requests waiver of any applicable rules or regulations, including waiver of the Commission's notice requirements set forth in Section 35.3 to allow the Black Start Agreement to become effective on the date that the Commission issues an order accepting this filing. Good cause exists to grant this waiver because the immediate provision of Black Start capability under the Black Start Agreement will foster reliability by enhancing CAISO's grid restoration plan. By its notice issued November 2, 2011, the Commission established November 22, 2011 as the date motions to intervene are to be filed in the above-captioned proceeding.

II. DESCRIPTION OF THE CAISO AND COMMUNICATIONS

The CAISO 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 CAISO 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 SDG&E, as well as the coordination of the ancillary services and real-time electricity markets in California.

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

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III. THE CAISO'S INTEREST

Black Start services to the CAISO are provided through the proposed Black Start Agreement referenced herein. Black Start capability is an important and necessary reliability service. As the Balancing Authority Area operator and as a party to the proposed Black Start Agreement, the CAISO has a unique interest in any Commission proceeding that affects the agreement. Accordingly, the CAISO 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 CAISO's interests in this proceeding, the CAISO's intervention is in the public interest and should be granted.

IV. COMMENTS

The CAISO supports the proposed Black Start Agreement and urges the Commission to accept it as requested by Orange Grove.

V. CONCLUSION

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

Dated: November 22, 2011

Respectfully submitted

By: /s/ Grace M. Arupo

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CERTIFICATE OF SERVICE

I hereby certify that I have, this 22nd day of November, 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.

Is/ Anna Pascuzzo

Anna Pascuzzo