

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

AES Huntington Beach, LLC

Docket No. ER16-318-000

**MOTION TO INTERVENE OUT OF TIME 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 November 13, 2015 Combined Notice of Filings, the California Independent System Operator Corporation (“CAISO”) submits this motion to intervene and comments in the above captioned proceeding. In support thereof, the CAISO states as follows:

I. DESCRIPTION OF THE PROCEEDING

On November 12, 2015, AES Huntington Beach, LLC (“AES HB”) submitted, pursuant to Section 205 of the Federal Power Act,¹ a request for approval of the extension of the Reliability Must-Run (“RMR”) Service Agreement (“RMR Agreement”) between AES HB and the CAISO. This annual filing, made in response to the CAISO’s notice to AES HB to extend the RMR Agreement for the 2016 contract year, is required by Section 4.11 of the RMR Agreement, as previously approved by the Commission.

¹ 16 U.S.C. §§ 824d and 824e.

By its notice issued on November 13, 2015, the Commission established December 3, 2015, as the date motions to intervene are to be filed in the above-captioned proceeding. Due to an oversight, the CAISO is filing this motion to intervene out of time and comments on December 9, 2015.

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 consisting of the transmission systems of a number of utilities, including Southern California Edison Company (“SCE”) and San Diego Gas & Electric Company (“SDG&E”), as well as the coordination of the day-ahead and real-time energy and ancillary services markets in California.

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

Sidney L. Mannheim
Assistant General Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630
Tel: 916-608-7144
Fax: 916-608-7222
smannheim@caiso.com

Dede Subakti
Director, Operations Engineering
Services
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630
Tel: 916-351-2454
Fax: 916-351-2487
dsubakti@caiso.com

III. THE CAISO'S INTEREST

As the Balancing Authority Area Operator responsible for maintaining reliability of the SCE and SDG&E transmission systems that are part of the CAISO controlled grid and as the counter party to the RMR Agreement, the CAISO has a unique interest in any Commission proceeding that affects this RMR Agreement. Accordingly, the CAISO has a direct and substantial interest in this proceeding and requests that it be permitted to intervene with full rights of a party. 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 intervenes in support of the extension of the RMR Agreement for contract year 2016, for the continued operation on a cost-of-service basis of two synchronous condensers that the CAISO has determined are necessary to provide voltage support in the Los Angeles Basin and San Diego/Imperial Valley local areas as the result of the unexpected shutdown of San Onofre Nuclear Generating Station ("SONGS") Units 2 and 3. The Commission previously approved the terms and conditions AES HB has filed for Contract Year 2015.²

² By order issued January 4, 2013, the Commission accepted the RMR Agreement, effective as of January 9, 2013. *AES Huntington Beach, L.L.C.*, Docket No. ER13-351-000, 142 FERC ¶ 61,017 (2013). The Commission accepted revisions to AES HB Rate Schedule No. 2, effective as of June 25, 2013. *AES Huntington Beach, L.L.C.*, Letter Order, Docket Nos. ER13-1630-000 and -001 (July 25, 2013).

V. CONCLUSION

For the foregoing reasons, the CAISO respectfully requests that the Commission grant this motion to intervene and make the CAISO a party to the above-captioned proceeding with full rights of participation.

Respectfully submitted,

By: /s/ Sidney L. Mannheim

Roger E. Collanton

General Counsel

Sidney L. Mannheim

Assistant General Counsel

California Independent System

Operator Corporation

250 Outcropping Way

Folsom, CA 95630

Tel: 916-608-7144

Fax: 916-608-7222

smannheim@caiso.com

Counsel for California Independent System
Operator Corporation

Dated: December 9, 2015

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, California this 9th day of December, 2015.

Jennifer Rotz
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