

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

San Diego Gas & Electric Company

Docket No. ER13-1535

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

I. Introduction

The California Independent System Operator Corporation (the ISO) submits this motion to intervene in this proceeding, which concerns an amended black start agreement by and between the ISO and San Diego Gas & Electric Company (SDG&E) as both a black start generator and participating transmission owner.¹ The ISO supports the Commission's acceptance of the amended black start agreement and asks that Commission make the agreement effective consistent with SDG&E's request on a date no later than July 1, 2013.

II. Motion to Intervene

The ISO is a non-profit public benefit corporation organized under the laws of the State of California, with a principal place of business at 250 Outcropping Way, Folsom, California. The ISO is an independent transmission system operator operating the transmission systems of its participating transmission owners. The ISO is a balancing authority and coordinates the ancillary services and electricity markets within its balancing authority area.

¹ The ISO submits this filing pursuant to Rule 212 of the Commission's Rules of Practice and Procedure, 18 C.F.R. §§ 385.212.

Under the terms of the ISO tariff, which is on file with the Commission, the ISO currently secures black start services through agreements.² SDG&E's filing includes a proposed amended agreement for black start services by and between the ISO and SDG&E, as both a black start generator and participating transmission owner. Accordingly, the ISO 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 ISO's interests in this proceeding, the ISO's intervention is in the public interest and should be granted.

III. Communications

Please address all communications concerning this proceeding to the following persons:

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* Individuals designated for service pursuant to Rule 203(b)(3).³

² ISO tariff section 8.3.1: "The CAISO will procure Black Start capability through individual contracts with Scheduling Coordinators for Reliability Must-Run Units and other Generating Units which have Black Start capability." The ISO currently procures black start from one reliability must-run generator. The remainder of the ISO's blackstart capability is provided by resources under blackstart agreements.

³ 18 C.F.R. § 385.203(b)(3).

IV. Conclusion

The ISO respectfully requests that the Commission grant its motion to intervene in the captioned proceeding and allow the ISO to participate in the proceeding with full rights as a party thereto. The ISO asks the Commission accept the amended black start agreement by and between the ISO and SDG&E and make the agreement effective on or before July 1, 2013.

Dated: June 10, 2013

Respectfully submitted,

By: /s/ Andrew Ulmer

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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 10th day of June 2013.

Asl Anna Pascuzzo
Anna Pascuzzo