

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

Greenleaf Energy Unit 2, LLC)	
)	Docket No. ER25-1421
)	

**MOTION TO INTERVENE AND COMMENTS OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION IN RESPONSE TO OFFER OF SETTLEMENT**

The California Independent System Operator Corporation (“CAISO”) submits this motion to intervene and comments¹ supporting the Offer of Settlement (Settlement) filed in this docket by Greenleaf Energy Unit 2, LLC (Greenleaf) on February 26, 2025.

I. Motion to Intervene

The Settlement relates to Greenleaf’s petition, currently pending before the Commission in Docket No. ER24-785-000, requesting relief from application of the CAISO tariff and the terms of the Reliability Must-Run (RMR) Agreement between Greenleaf and the CAISO. The Settlement revises the RMR Agreement between the CAISO and Greenleaf. As a party to the RMR Agreement and Docket No. ER24-785-000, the CAISO has a direct interest in this proceeding. Because no other party can adequately represent the CAISO’s interests in the proceeding, the CAISO’s intervention is in the public interest and should be granted.

¹ The CAISO submits these comments pursuant to Rules 212 and 214 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. §§ 385.212, 385.214.

II. Comments

The CAISO, Greenleaf, and the California Public Utilities Commission (Active Parties) spent considerable time engaging in multiple informal settlement discussions regarding Greenleaf's petition. The Settlement accurately reflects the culmination of the Active Parties' settlement discussions and appropriately resolves all of the disputed issues in Docket No. ER24-785-000. Furthermore, approval of the agreement will avoid unnecessary and costly litigation. As a result, Commission acceptance of the Settlement Agreement will have a just and reasonable outcome. The Commission should accept the Settlement as filed.

III. Communications

In accordance with Rule 203(b)(3) of the Commission's Rules of Practice and Procedure, the CAISO respectfully requests that service of all pleadings, documents, and all communications regarding this proceeding be addressed to these individuals:

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IV. Conclusion

The Settlement fully resolves all issues in Greenleaf's petition. The CAISO supports the Settlement and strongly encourages the Commission to approve the Settlement, without modification, as soon as practical to bring this matter to a definitive conclusion. The Settlement is fair and reasonable and in the public interest.

/s/ Marissa Mercado

Roger E. Collanton

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Counsel for the California Independent
System Operator

Dated: March 18, 2025

CERTIFICATE OF SERVICE

I certify that I have served the foregoing document upon the parties listed on the official service list in the captioned 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 18th day of March, 2025.

/s/ Ariana Rebancos

Ariana Rebancos

An employee of the California ISO