

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

Brookfield Renewable Trading and Marketing LP)	Docket No.	ER21-2370
DTE Energy Trading, Inc.)		ER21-2373
EDF Trading North America, LLC)		ER21-2380
Shell Energy North America (US), L.P.)		ER21-2382
Guzman Energy, LLC)		ER21-2396
Morgan Stanley Capital Group Inc.)		ER21-2442
Black Hills Power, Inc.)		ER21-2443
Exelon Generation Company, LLC)		ER21-2453
Rainbow Energy Marketing Corporation)		ER21-2456
Tri-State Generation and Transmission Association, Inc.)		ER21-2457
Tenaska Power Services Co.)		ER21-2459
TransAlta Energy Marketing (U.S.) Inc.)		ER21-2461
Public Service Company of New Mexico)		ER21-2463
Avangrid Renewables, LLC)		ER21-2464

**MOTION TO INTERVENE OF THE DEPARTMENT OF MARKET MONITORING
OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Pursuant to Rule 212 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“FERC” or “Commission”), 18 C.F.R. §§385.212, the Department of Market Monitoring (“DMM”), acting in its capacity as the Independent Market Monitor for the California Independent System Operator Corporation (“CAISO”), submits this motion to intervene in the above-captioned proceedings.

I. MOTION TO INTERVENE

In these proceedings, various entities have submitted cost justification filings for spot market sales in the Western Electric Coordinating Council (“WECC”) outside the California Independent System Operator (“CAISO”) markets that exceeded the “soft” cap of \$1,000/MWh (“WECC soft offer cap”) during June 2021. Bilateral price indices reported for Western trading hubs are utilized in numerous ways which greatly magnify the impact of

these indices on the broader bilateral markets, the CAISO markets and the Western Energy Imbalance Market. The CAISO uses price indices for bilateral hubs outside of the CAISO system to determine the reasonableness of prices for import bids submitted into the CAISO markets which are allowed to set CAISO market prices. The Commission's decisions in all of these cost justification proceedings concerning sales over the WECC soft offer cap will establish important future precedent and market expectations in bilateral markets throughout the WECC and the CAISO's organized day-ahead and real-time energy markets.

Consequently, DMM respectfully requests that the Commission afford due consideration to this motion to intervene, and afford DMM full rights as a party to this proceeding.

Respectfully submitted,

By: /s/ Eric Hildebrandt

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Independent Market Monitor for the
California Independent System Operator

Dated: July 28, 2021

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 28th day of July, 2021.

Jennifer Shirk
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