

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

AES Huntington Beach, LLC

Docket No. ER14-177-000

**MOTION TO INTERVENE 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 (2012), and the Commission’s October 25, 2013 Combined Notice of Filings, the California Independent System Operator Corporation (“ISO”) submits this motion to intervene and comments in the above captioned proceeding. In support thereof, the ISO states as follows:

I. DESCRIPTION OF THE PROCEEDING

On October 24, 2013, 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 ISO. This annual filing, made in response to the ISO’s notice to AES HB to extend the RMR Agreement for the 2014 contract year, is required by Section 4.11 of the RMR Agreement to allow Contract Service Limits and payments for the 2014 Contract Year to go into effect January 1, 2014, as previously approved by the Commission.

¹ 16 U.S.C. §§ 824d and 824e.

By its notice issued October 25, 2013, the Commission established November 14, 2013, as the date motions to intervene are to be filed in the above-captioned proceeding.

II. DESCRIPTION OF THE ISO AND COMMUNICATIONS

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

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III. THE ISO'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 ISO controlled grid and as the counter party to the RMR Agreement, the ISO has a unique interest in any Commission proceeding that affects this RMR Agreement. 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.

IV. COMMENTS

The ISO intervenes in support of the extension of the RMR Agreement for 2014, and specifically in support of the Contract Service Limits and rates as filed by AES HB, for the continued operation on a cost-of-service basis of two synchronous condensers that the ISO 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 2014.²

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 AESHB 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 ISO respectfully requests that the Commission grant this Motion to Intervene and make the ISO a party to the above-captioned proceeding with full rights of participation.

Respectfully submitted,

By: /s/ Sidney M. Davies

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Counsel for California Independent
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Dated: November 14, 2013

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 14th day of November 2013.

Anna Pascuzzo

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