



responsible for the reliable operation of the electric grid comprising the transmission systems of a number of utilities including Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas and Electric Company (“SDG&E”) as well as the coordination of the ancillary services and real-time electricity markets in California.

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

Sidney Mannheim Davies  
Assistant General Counsel  
California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
Tel: (916) 608-7144  
Fax: (916) 608-7222  
E-mail: [sdavies@caiso.com](mailto:sdavies@caiso.com)

Robert C. Kott  
Manager of Model and Contract  
Implementation  
Gil Grotta  
Lead Contract Engineering Specialist  
California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
Tel: (916) 608-5804  
Fax: (916) 351-2487  
E-mail: [rkott@caiso.com](mailto:rkott@caiso.com)  
E-mail: [ggrotta@caiso.com](mailto:ggrotta@caiso.com)

### **III. CAISO’S INTEREST**

Dynegy South Bay’s Units are located within SDG&E’s service area. This facility is needed to maintain the reliability of the CAISO Controlled Grid. As the Balancing Authority Area operator and as the counter party to the RMR Agreements, the CAISO has a unique interest in any Commission proceeding that affects an RMR Agreement. Accordingly, the CAISO has a direct and substantial interest in this proceeding and requests that it be permitted to intervene. Because no other party can adequately represent the CAISO’s interests in this proceeding and in the absence of any prejudice to any party to

this proceeding<sup>1</sup>, the CAISO's intervention is in the public interest and should be granted.

#### **IV. CONCLUSION**

For the foregoing reasons, the CAISO respectfully requests that the Commission grant this Motion to Intervene Out-of-Time and make the CAISO a party in the above-caption proceeding with full rights of participation.

Dated: November 26, 2008

Respectfully submitted

**/s/ Sidney Mannheim Davies**  
Sidney Mannheim Davies

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<sup>1</sup> Due to administrative oversight, the deadlines for comments and protests in this proceeding did not get calendared.

**CERTIFICATE OF SERVICE**

I hereby certify that I have, this 26<sup>th</sup> day of November 2008, caused to be served a copy of the forgoing document upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

**/s/ Anna Pascuzzo**  
Anna Pascuzzo