

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

Dynergy Oakland, LLC

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)

Docket No. ER11-1964

**MOTION OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR  
CORPORATION TO FOR LEAVE TO INTERVENE OUT OF TIME**

**I. INTRODUCTION**

The California Independent System Operator Corporation (ISO) submits this motion for leave to intervene out of time regarding the filing made by Dynergy Oakland LLC for revisions to certain schedules of its reliability must run agreement with the ISO.<sup>1</sup> The ISO seeks to intervene in this proceeding because it is a party to the agreement. The ISO does not seek to raise any new issues. Thus, the Commission's grant of the ISO's motion to intervene out of time will not prejudice any of the parties to this proceeding.

**II. BASIS FOR MOTION TO INTERVENE**

The ISO is a non-profit public benefit corporation organized under the laws of the State of California. The ISO is responsible for the reliable operation of a grid comprising the transmission systems of various public utilities, including Pacific Gas and Electric Company, as well as coordination of day-ahead and real time energy and ancillary services markets in California. The ISO is a party to the reliability must run agreement submitted for the Commission's review. As a party to the contract with Dynergy, the ISO has an interest in these proceedings that no other

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<sup>1</sup> The ISO submits this motion pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission, 18 C.F.R. § 385.214, and the Commission's notice of filing issued on November 1, 2010.

party can represent and therefore requests that it be allowed to intervene in this proceeding out of time.

### III. COMMUNICATIONS

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

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\*Designated to receive service

### IV. CONCLUSION

The ISO requests that the Commission grant the ISO's motion to intervene in this proceeding because the ISO is party to the agreement for which Dynegy seeks approval.

Respectfully submitted,

**By: /s/ Sidney Davies**

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Attorneys for the California Independent  
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Dated: November 30, 2010

## 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 30<sup>th</sup> day of November, 2010.

*/s/ Anna Pascuzzo*

Anna Pascuzzo