

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

**Williams Energy Services Company )      Docket No. ER98- 3106- 000**

**MOTION OF  
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION  
TO FILE MOTION TO INTERVENE AND PROTEST OUT OF TIME**

Pursuant to Rule 212 of the Commission's Rules of Practice and Procedure, 18 C.F.R. §§ 385.212, the California Independent System Operator Corporation ("ISO"), hereby moves for leave to file a Protest out of time in the above-entitled proceedings.

In these dockets, Williams Energy Services Company ("Williams") seeks, inter alia, blanket market-based rate authorization for sales of four ancillary services -- Regulation, Spinning Reserve, Non-spinning Reserve, and Replacement Reserve, each as defined in the ISO Tariff (collectively, the Regulation and Reserve Services). The Commission has only recently issued its first grant of authority for the sale of Regulation and Reserve Services at market-based rates. See *AES Redondo Beach, L.L.C., et al.*, 83 FERC 61, 358, (June 30<sup>th</sup> Order). Subsequently, the Commission has granted such authority to additional applicants. *El Segundo Power, LLC et al.*, 84 FERC ¶ 61,011 (1998); *Ocean Vista Power Generation, LLC et al.*, 84 FERC ¶ 61,013 (1998) (July 10<sup>th</sup> Orders).

Events subsequent to the June 30<sup>th</sup> and July 10<sup>th</sup> Orders have demonstrated that an unconditional grant of the market-based rate authority requested by Williams would have enormous adverse consequences for the California market. The ISO therefore seeks to intervene in this proceeding and to protest Williams's filings at this time. The ISO should be granted leave to protest out of time to present to the Commission data bearing directly on the untoward consequences of granting the unconditional market-based rate authority sought

in these dockets, which data were not available at the time specified for intervention and protest in this proceeding.

**CONCLUSION**

WHEREFORE, the ISO respectfully requests that the Commission grant it leave to file a Motion to Intervene and Protest out of time in the above-entitled proceedings.

Respectfully submitted,

N. Beth Emery  
Vice President and General Counsel  
Roger E. Smith, Regulatory Counsel  
The California Independent  
System Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
Tel: 916-351-2334  
Fax: 916-351-2350

Kenneth G. Jaffe  
Swidler & Berlin, Chartered  
3000 K St., NW #300  
Washington, DC 20007  
Tel: 202-424-7588  
Fax: 202-424-7645

Edward Berlin  
Michael E. Ward

Date: July 17, 1998

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the forgoing document upon each person designated on the official service list compiled by the Secretary in this Docket No. ER98-3106-000 in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. §385.2010 (1997).

Dated at Washington, D.C. on this 17<sup>th</sup> day of July, 1998.

Michael E. Ward

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