

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

Southern California Edison Company)

Docket No. ER98-2322-000

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

Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, the California Independent System Operator Corporation (ISO) hereby moves to intervene out of time in the captioned proceeding. In support of its motion, the ISO states the following:

1. The following persons should be included on the official service list in this proceeding, and all communications concerning this motion should be addressed to them:

N. Beth Emery  
William G. Hayes  
California Independent System Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
Tel: (916) 351-2334  
Fax: (916) 351-2350

Stephen Angle  
Linda L. Walsh  
Howrey & Simon  
1299 Pennsylvania Avenue, NW  
Washington, DC 20004  
Tel: 202-383-7261  
Fax: 202-383-6610

2. The ISO's principal place of business is located at 151 Blue Ravine Road, Folsom, CA 95630. The ISO is a non-profit public benefit corporation organized and existing under the laws of the State of California. Since March 31, 1998, the ISO has been operating the ISO Controlled Grid that is initially composed of the transmission systems of Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas and Electric Company (SDG&E). The ISO is responsible for the reliability of electric

transmission that is scheduled through the grid. The ISO's activities are subject to the Commission's jurisdiction.

3. On March 26, 1998, Southern California Edison Company filed a revised Transmission Owners Tariff (TO Tariff) to reflect changes to the pro forma TO Tariff that it filed on August 15, 1997.

4. The ISO requests intervention in this proceeding. As the entity responsible for the reliable operation of the transmission grid involving the facilities of PG&E, SCE and SDG&E, the ISO has an interest, which may be directly affected by the outcome of this proceeding. The ISO requests that the Commission find that good cause exists to allow this intervention out of time, pursuant to Rule 214(d). The ISO did not file its motion to intervene by April 17, 1998, the time prescribed by the Commission's Notice of Filing of April 3, 1998, because of inadvertent administrative oversight. Allowing this intervention will not create any additional burdens on parties to the proceeding, because of the early stage of this proceeding and the ISO is already a party to SCE's existing TO Tariff proceeding in ER98-2355-000.

WHEREFORE, the ISO requests that it be permitted to intervene out of time as a party in this proceeding.

Respectfully submitted,

**CALIFORNIA INDEPENDENT SYSTEM  
OPERATOR CORPORATION**

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Dated: April 21, 1998

**Certificate of Service**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated the 21st day of April 1998

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Linda L. Walsh