

II. BACKGROUND

On June 9, 1999, Southern California Edison Company ("SCE") tendered for filing an unexecuted copy of the Harborgen Substation Service Agreement ("Agreement") between SCE and Harbor Cogeneration Company ("Harbor"). Harbor has requested Interconnection under SCE's Transmission Owner Tariff commencing June 10, 1999, and terminating on a date between September 30, 1999, and December 31, 1999. Harbor and SCE, however, have not been able to reach a consensus regarding the terms, conditions, and pricing involved in the service requested under SCE's Transmission Owner Tariff. To accommodate Harbor's requested service initiation date, SCE has filed and seeks FERC approval of an unexecuted agreement.

The Agreement specifies the principles, terms, and conditions of interconnected operation between SCE and Harbor's facilities. In particular, the Agreement indicates that Harbor will be responsible for making all necessary arrangements with the ISO, including scheduling the delivery of Energy to or from the ISO Controlled Grid. Harbor also will be responsible for providing ISO certified metering for its facility and for providing SCE with metering data for planning and retail billing purposes.

In addition, the Agreement specifies that if capital additions are required to maintain service to Harbor, Harbor will bear the complete cost of such additions, or will terminate service. Further, the Agreement indicates that Harbor will pay to SCE a combination of Interconnection Facilities Charges and reimbursable FERC fees.

The parties request that the Agreement become effective as of June 10, 1999.

III. BASIS FOR MOTION TO INTERVENE

The ISO is a non-profit public benefit corporation organized under the laws of the State of California and responsible for the reliable operation of a grid comprising the transmission systems of Pacific Gas and Electric Company, San Diego Gas & Electric Company, and SCE, as well as for the coordination of the competitive electricity market in California.

At issue in this proceeding is an Agreement which provides for Harbor to interconnect with SCE on the ISO Controlled Grid. One of the ISO's responsibilities is ensuring that Interconnection to the ISO Controlled Grid does not affect the reliability of the grid. The ISO notes that currently the Interconnection of Generators to existing transmission systems is governed by the ISO Tariff and the Transmission Owner Tariffs of Pacific Gas and Electric Company, San Diego Gas & Electric Company, and SCE.

The ISO further notes that it recently submitted Amendment No. 19 to the ISO Tariff in Docket No. ER99-3339-000 on June 23, 1999. Amendment No. 19 would modify the ISO Tariff to implement the ISO's New Generator Interconnection Policy ("NewGen Policy"), which sets forth the obligations and responsibilities of Generating Units requesting Interconnection to the ISO Controlled Grid and the procedures and requirements for processing such Interconnection requests. In particular, the NewGen Policy when implemented would ensure that the Interconnection of New Generating Units would not adversely impact the ISO Controlled Grid. Further, the NewGen Policy would hold New Generators responsible for mitigating the incremental Intra-Zonal Congestion created by their Interconnection to the ISO Controlled Grid.

The ISO therefore has an interest in this proceeding that cannot be represented by any other party. Accordingly, the ISO requests that it be permitted to intervene herein with full rights of a party.

The ISO reserves the right to raise substantive issues in any further aspects of the proceeding ordered by the Commission.

IV. CONCLUSION

Wherefore, for the foregoing reasons, the ISO respectfully requests that the Commission permit it to intervene, and that it be accorded full party status in this proceeding.

Respectfully submitted,

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Date: June 29, 1999

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 at Washington, DC, on this 29th day of June, 1999.

Sara C. Weinberg

June 29, 1999

The Honorable David P. Boergers
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: **Southern California Edison Company,
Docket No. ER99-3182-000**

Dear Secretary Boergers:

Enclosed for filing are one original and 14 copies of the Motion to Intervene of the California Independent System Operator Corporation in the above-referenced proceeding. Two additional copies of the filing are also enclosed. Please stamp the two additional copies with the date and time filed and return them to the messenger.

Thank you for your assistance in this matter.

Respectfully submitted,

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