

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

**Sierra Pacific Power Company and
Nevada Power Company**

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Docket No. EC99-100-000

**MOTION TO INTERVENE AND COMMENTS OF THE CALIFORNIA INDEPENDENT
SYSTEM OPERATOR CORPORATION**

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission"), 18 C.F.R. § 385.214, and the Commission's July 29, 1999, Notice of Filing, the California Independent System Operator Corporation ("CAISO") hereby moves to intervene in the above-captioned proceeding. In support of this Motion, the CAISO states the following:

I. COMMUNICATIONS

Please address communications concerning this filing to the following persons:

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and General Counsel

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II. BACKGROUND

On July 23, 1999, Sierra Pacific Power Company and Nevada Power Company ("Applicants") tendered for filing with the Commission, a Joint Application for Authorization of Transfer of Control Over Transmission Facilities. The application

seeks approval under Section 203 of the Federal Power Act to transfer control of transmission facilities to an independent entity, the Mountain West Independent Scheduling Administrator ("Mountain West"). A companion filing was made under Section 205 of the Federal Power Act in the proceeding captioned *Mountain West Independent System Administrator*, Docket No. ER99-3719-000. Mountain West is intended to assume on an interim basis the functions described in the Section 205 filing. The Mountain West Section 205 filing discusses in detail the level of control being transferred to Mountain West, and includes the Mountain West Tariff, the Transmission Owner's Tariff, and *pro forma* versions of related agreements.

III. BASIS FOR MOTION TO INTERVENE AND COMMENTS

The CAISO is a non-profit public benefit corporation organized under the laws of the State of California. It is responsible for the reliable operation of a grid comprising the transmission systems of Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company, as well as for the coordination of the competitive electricity market in California. The CAISO is the Security Coordinator for the areas of California and Mexico in the Western Systems Coordinating Council ("WSCC").

As control area operator for approximately 40% of the load of the WSCC, the CAISO is particularly affected by any changes in the transmission grid in the Western Interconnection, but more so for contiguous states, including Nevada. The establishment and operation of an Independent System Administrator ("ISA") in Nevada will affect the operations of the CAISO Controlled Grid. The CAISO therefore has an

interest in the proceeding. Accordingly, the CAISO requests that it be permitted to intervene in this proceeding with full rights of a party.

The CAISO is filing contemporaneously comments and a request for a technical conference in the Section 205 companion filing of Mountain West in Docket No. ER99-3719. Because of the interrelationship of the two filings, the Commission should consider those comments in its evaluation of this Section 203 filing.

IV. CONCLUSION

Wherefore, for the foregoing reasons, the CAISO 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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Counsel for the California Independent
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Date: August 23, 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 23rd day of August, 1999.

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