

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

**Application of San Diego Gas & Electric  
Company (U 902 E) for Authority to Enter into  
Purchase Power Tolling Agreements with  
Escondido Energy Center, Pio Pico Energy  
Center and Quail Brush Power.**

**A.11-05-023**

**Motion of the California Independent System Operator  
Corporation to Intervene**

Pursuant to Rules 1.4 and 11 of the Rules of Practice and Procedure of the California Public Utilities Commission, the California Independent System Operator Corporation (“the ISO”) files this motion to intervene as a party to this proceeding in order to provide information about local capacity needs in the San Diego area.

In the Joint Assigned Commissioner Ruling (ACR) issued on January 18, 2012, the Commission noted that, after the evidentiary hearing was held and briefs were submitted in the LTPP docket, the ISO released its preliminary 2011-2012 transmission planning study results (on December 8, 2011) which include an assessment of the local capacity needs in San Diego. In addition, the ISO has now released the draft 2011-2012 transmission plan providing additional study details about this issue. The ISO understands that the Commission would like to consider these study results on the record of this proceeding, rather than re-opening the record in the LTPP proceeding to which the ISO is already a party.<sup>1</sup> Accordingly, the ISO requests leave to intervene in order to present testimony in support of its local capacity studies and to address the need for resources in San Diego.

We understand that the Administrative Law Judge likely will be establishing a scope and schedule for the remainder of this proceeding. To facilitate that process, the ISO is willing to provide written testimony detailing its

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<sup>1</sup> On February 21, 2012, a Proposed Decision was issued on Track 1 and III issues in R.10-05-006. At page 12 the PD states that the San Diego local capacity issue litigated in the LTPP proceeding would be resolved in this docket.

local capacity area study methodology, results and policy considerations, and should be able to serve this testimony on parties by March 9, 2012. In order to expedite the discovery process, the ISO supports conducting a workshop to explain its study methodology and answer questions. The ISO is also willing to make its witnesses available to testify, subject to their availability, should the Commission determine that an evidentiary hearing is necessary.

Pursuant the Rule 1.4, the ISO's studies and testimony are pertinent to the issues presented in this matter and the Commission should grant the ISO leave to intervene.

Respectfully submitted,  
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