

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

Lake Elsinore Advanced Pumped Storage Project

Project No. 11858-02

**MOTION TO INTERVENE AND COMMENTS OF THE CALIFORNIA  
INDEPENDENT SYSTEM OPERATOR CORPORATION IN SUPPORT OF  
LAKE ELSINORE ADVANCED PUMPED STORAGE PROJECT**

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. § 385.214, the California Independent System Operator Corporation (“ISO”) hereby moves to intervene in the captioned proceeding and offer comments in support of the Lake Elsinore Advanced Pumped Storage Project (“LEAPS”).

In support thereof, the ISO respectfully states as follows:

**I. COMMUNICATIONS**

Please address communications concerning this filing to the following persons:

Anthony J. Ivancovich  
Senior Regulatory Counsel  
California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
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Jeffrey C. Miller  
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## **II. BACKGROUND**

On February 2, 2004, Elsinore Water District and the Nevada Hydro Company, Inc. filed a hydroelectric application with the Commission to develop the LEAPS Project. On February 11, 2004, the Commission issued a "Notice of Application Tendered for Filing With the Commission and Soliciting Additional Study Requests."

## **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 & Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and the Cities of Vernon, Anaheim, Azusa, Banning and Riverside, California. As the operator of this grid, the ISO believes that it has a unique interest in any Commission proceeding concerning the issues raised in the captioned proceeding.

## **IV. COMMENTS**

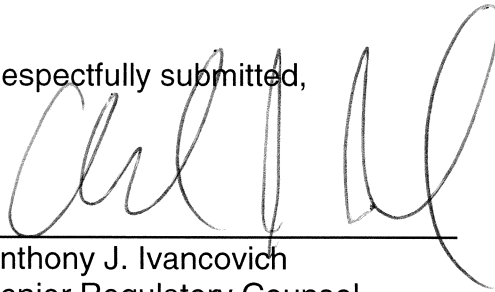
The California ISO is responsible for reliably planning and operating the majority of the power grid in California. One of the areas of the power grid where reliability is particularly a concern to the ISO is the San Diego area. While the transmission facilities serving San Diego are sufficient today, in the near future, as load increases or as the existing antiquated generation in the area retires, the transmission system is projected to be inadequate. Current studies indicate that

this inadequacy may occur in as early as two years or as late as five years depending on whether current plans for new generation in San Diego materialize. The transmission line proposed in association with the Lake Elsinore Pumped Storage project would allow the San Diego area to import substantially more power from surrounding areas and would greatly enhance electric system reliability. As a result, the California ISO is requesting to intervene in this proceeding in strong support of the Lake Elsinore Pumped Storage Project.

**V. CONCLUSION**

For the foregoing reasons, the ISO respectfully requests that the Commission permit it to intervene in the captioned proceeding with full rights as a party.

Respectfully submitted,



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Anthony J. Ivancovich  
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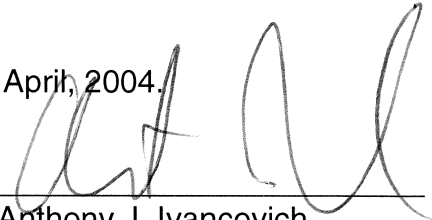
Counsel for the California Independent  
System Operator Corporation

Date: April 2, 2004

## CERTIFICATE OF SERVICE

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

Dated at Folsom, CA, this second day of April, 2004.



Anthony J. Ivancovich



April 2, 2004

The Honorable Magalie Roman Salas  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

**Re: Lake Elsinore Advanced Pumped Storage Project  
Project No. 11858-02**

Dear Secretary Salas:

Enclosed please find an electronic filing of the Motion to Intervene of the California Independent System Operator Corporation. Thank you for your attention to this filing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Anthony J. Ivancovich', written over a light gray grid background.

Anthony J. Ivancovich

Counsel for the California Independent  
System Operator Corporation