

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

**Puget Sound Energy, Inc.**

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**Docket No. EL01-10-000**

**MOTION TO INTERVENE 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 October 31, 2000 Notice of Filing, the California Independent System Operator Corporation ("ISO") hereby moves to intervene in the above-captioned proceeding.<sup>1</sup> In support thereof, the ISO states as follows:

**I. COMMUNICATIONS**

Please address communications concerning this filing to the following persons:

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<sup>1</sup> As described in the Commission's notice of filing, interventions in the above-captioned proceeding were due by November 16, 2000. The ISO is filing its intervention on November 17 because on November 16 the Commission's dockets operations had to be closed due to unforeseen circumstances. The Commission issued on its Web site a notice stating that any documents which were due on November 16 but were instead filed on November 17 would be considered timely filed.

## **II. BACKGROUND**

On October 26, 2000, Puget Sound Energy, Inc. (“PSE”) tendered for filing, pursuant to Section 206 of the Federal Power Act, 18 C.F.R. § 385.206, a complaint against all jurisdictional sellers of energy and/or capacity at wholesale into electric energy and/or capacity markets in the Pacific Northwest, including parties to the Western Systems Power Pool Agreement (“WSPP Agreement”).

In its complaint, PSE petitions the Commission for an order capping the prices at which sellers subject to Commission jurisdiction, including sellers of energy or capacity under the WSPP Agreement, may sell capacity or energy into the Pacific Northwest’s wholesale power markets. Specifically, PSE seeks an order that caps the prices for wholesale sales of energy or capacity into the Pacific Northwest at a level equal to the lowest cap on prices established, ordered, or permitted by the Commission for wholesale purchases in or wholesale sales of energy or capacity to or through markets operated by the ISO or the California Power Exchange Corporation. PSE seeks a refund effective date, to the extent that any refund is called for, of sixty days after the filing of the complaint.

## **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 Southern California Edison Company, as well as for the coordination of the competitive electricity market in California. As

the operator of this grid and facilitator of regional energy markets, the ISO believes that it has a unique interest in any Commission proceeding that concerns the performance of regional energy markets and that may impact a contiguous transmission system. PSE itself notes that “California and Pacific Northwest markets are part of the substantially integrated wholesale power market of the Western Interconnection . . . .” See PSE complaint at 7-9. Accordingly, the ISO requests that it be permitted to intervene herein with full rights as a party.

The ISO raises no substantive issues at the present time. However, the ISO plans to address regional market power and pricing issues in the Western Interconnection, as well as related issues, in its comments to be filed by November 22, 2000, as specified by the Commission in its November 1, 2000 “Order Proposing Remedies for California Wholesale Electric Markets.” See *San Diego Gas & Electric Company v. Sellers of Energy and Ancillary Services Into Markets Operated by the California Independent System Operator Corporation and the California Power Exchange, et al.*, 93 FERC ¶ 61,121, 61,373.

#### **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: November 17, 2000