

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

**San Diego Gas & Electric Company**

)  
)  
)

**Docket No. ER01-322-000**

**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 November 7, 2000, Notice of Filing, the California Independent System Operator Corporation (“ISO”)<sup>1</sup> hereby moves to intervene in the above-captioned proceeding and protests. In support thereof, the ISO states as follows:

**I. COMMUNICATIONS**

Please address communications concerning this filing to the following persons:

Charles Robinson, General Counsel  
Roger E. Smith, Sr. Regulatory Counsel  
Beth Ann Burns, Regulatory Counsel  
The California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
Tel: (916) 608-7135  
Fax: (916) 608-7296

Edward Berlin  
Kenneth G. Jaffe  
Michael E. Ward  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, NW, Suite 300  
Washington, DC 20007  
Tel: (202) 424-7500  
Fax: (202) 424-7643

---

<sup>1</sup> Capitalized terms not otherwise defined herein are used in the sense given in the Master Definitions Supplement, Appendix A to the ISO Tariff.

## **II. BASIS FOR MOTION TO INTERVENE**

On November 1, 2000, San Diego Gas & Electric Company (“SDG&E”) tendered for filing with the Commission amendments to its Transmission Owner Tariff (“TO Tariff”). Therein, SDG&E seeks to revise its Reliability Must-Run (“RMR”) revenue requirement and RMR charges to be applied to transmission service rendered on and after January 1, 2001, in accordance with Appendix VII of its TO Tariff. SDG&E’s RMR revenue requirement is based on the forecast payments that SDG&E will make to the ISO for the upcoming calendar year, plus the recorded balance in the RMR balancing account (“RMRBA”) as of November 30 of the current year. However, pursuant to the settlement in ER00-860-000, in which SDG&E agreed to make the filing at issue by October 30, 2000, SDG&E proposes to use the balance recorded in the RMRBA as of September 30, 2000. SDG&E also seeks to amend its TO Tariff to reflect changes in the definition of reliability charges to include the costs of ISO calls for out-of-market (“OOM”) generation that may be billed to SDG&E by the ISO, and to provide for the recovery of such OOM and RMR costs from all retail and wholesale load located within SDG&E’s Service Area.

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 California’s investor-owned utilities – Pacific Gas & Electric Company, SDG&E and Southern California Edison – as well as for the coordination of the competitive electricity market in California. The amendments SDG&E proposes to its TO tariff will determine its recovery of costs assessed under the ISO Tariff for services necessary to the ISO’s fulfillment of its responsibilities for maintaining

reliability. The ISO therefore has an interest in proceedings, such as the instant proceeding, that may affect SDG&E's ability to recover those costs. This interest cannot adequately be represented by any other party. The ISO is responsible for ensuring nondiscriminatory access to the ISO Controlled Grid, which may be affected by the allocation of the costs of ensuring reliability among the users of the ISO Controlled Grid. The ISO's participation in this proceeding is therefore in the public interest.

### **III. 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. While the ISO has no substantive issues that it wishes to raise at the present time, it reserves the right to file supplemental comments if warranted.

Respectfully submitted,

Charles Robinson, General Counsel  
Roger E. Smith, Sr. Regulatory Counsel  
Beth Ann Burns, Regulatory Counsel  
California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630

---

Edward Berlin  
Kenneth G. Jaffe  
Michael E. Ward  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, NW, Suite 300  
Washington, DC 20007  
Tel: (202) 424-7500  
Fax: (202) 424-7643

Counsel for the California Independent  
System Operator Corporation

Date: November 27, 2000

## **CERTIFICATE OF SERVICE**

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

Dated at Washington, DC, on this 27<sup>th</sup> day of November, 2000.

---

Michael E. Ward

November 27, 2000

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

Re: **San Diego Gas & Electric Company,  
Docket No. ER01-322-000**

Dear Secretary Boergers:

Enclosed for filing are one original and 14 copies of the Motion to Intervene and Protest the California Independent System Operator Corporation in the above-identified 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.

Yours truly,

Michael E. Ward

Counsel for the California  
Independent System Operator Corporation