



November 19, 2004

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

**Re: City of Pasadena, California  
Docket No. EL05-18-000**

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,

**/s/ Anthony J. Ivancovich**  
Anthony J. Ivancovich

Counsel for the California Independent  
System Operator Corporation



Anthony J. Ivancovich\*  
Senior Regulatory Counsel  
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**\*Individual designated for service pursuant to Rule 203 (b)(3), 18 C.F.R. § 203(b)(3)**

## **II. BACKGROUND**

On October 29, 2004, the City of Pasadena, California (Pasadena) submitted for filing a Petition for Declaratory Order and Request for Waiver of Filing Fee. Pasadena's Petition requests that the Commission issue an order: (1) accepting Pasadena's Transmission Revenue Requirement (TRR) and Transmission Owner (TO) Tariff submitted with Pasadena's Petition for filing effective as of the later of January 1, 2005, or the effective date of a Transmission Control Agreement acceptable to Pasadena, (2) approving Pasadena's TRR, (3) waiving the filing fee for Pasadena's petition, and (4) granting any other relief or waivers as may be necessary or appropriate for approval or implementation of Pasadena's TRR and TO Tariff.

By its Notice issued November 3, 2004, the Commission established November 19, 2004, as the date motions to intervene are to be filed in the above-captioned proceeding.

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<sup>2</sup> In addition to Mr. Ivancovich and Mr. Rubin, the ISO respectfully requests that Ms. Le Vine be included in the Official Service List. Mr. Ivancovich and Ms. Le Vine work in separate buildings, and it would be of significant assistance to the ISO if both were included on the list.

**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 PG&E, 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. COMMENT**

The ISO Governing Board has approved Pasadena as a New Participating TO at its meeting on November 10, 2004. Currently, the ISO is working with the Participating TOs to finalize the addition of Pasadena to the Transmission Control Agreement and will file it with the Commission as soon as possible.

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**V. CONCLUSION**

For the foregoing reasons, the ISO respectfully requests that the Commission permit it to intervene, and that the ISO be accorded full party status in this proceeding.

Respectfully submitted,

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

Date: November 19, 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 19th day of November 2004.

**/s/ Anthony J. Ivancovich**  
Anthony J. Ivancovich