

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

Sierra Pacific Power Company

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Docket No. ER99-28-000

**MOTION TO INTERVENE OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214, and the Commission's October 17, 1998 Notice, the California Independent System Operator Corporation ("ISO") hereby moves to intervene in the above-captioned proceeding.

I. COMMUNICATIONS

Please address communications concerning this filing to the following persons:

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II. BACKGROUND

On October 2, 1998, Sierra Pacific Power Company ("Sierra") filed for Commission approval the Alturas Intertie Project Interconnection and Operation and Maintenance Agreement ("Agreement") between Sierra, the Bonneville Power Administration ("Bonneville"), and PacifiCorp.

The Agreement governs: (1) ownership of the new facilities to be constructed as part of the Alturas Intertie Project; (2) assignment of responsibility for operation and maintenance of those facilities; and

(3) the interconnected operation of the Project. The Alturas Intertie Project consists of an approximately 200 mile long 345 kV transmission line from Sierra's North Valley Road Substation, north of Reno, Nevada, to Sierra's Hilltop Substation near Alturas California. The Project will be interconnected with Bonneville's Malin-Warner transmission line, to be located in Bonneville's control area, and will terminate at PacifiCorp's Malin Substation facilities. The Project is currently under construction and is expected to be completed and the line placed in service in December 1998. Sierra is therefore requesting that the Agreement be approved without modification or suspension, to be effective as of December 1, 1998.

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, Southern California Edison Company and San Diego Gas & Electric Company. As part of this function, the ISO is responsible for coordination with control areas interconnected with the ISO's Control Area. The ISO has therefore entered into Interconnected Control Area Operating Agreements with Sierra and PacifiCorp. The ISO has also entered into Scheduling Coordinator Agreements with various California Market Participants, including PacifiCorp and Bonneville. The ISO therefore has a unique interest in any FERC proceedings that could impact on the operation of the ISO-Controlled Grid or affect coordination with interconnected control areas.

At this time, the ISO is not raising any substantive issues concerning the Agreement submitted by Sierra in this proceeding. The ISO notes that, pursuant to Section 12(c) of the Agreement, Sierra, Bonneville and PacifiCorp are currently negotiating guidelines to provide further detail regarding the

scheduling of power and operation of the Alturas Intertie Project. The ISO reserves the right to modify its pleadings to address any substantive issue arising in this proceeding in the future.

IV. CONCLUSION

Based on the foregoing, 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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Attorneys for the California Independent System Operator Corporation

Date: October 22, 1998

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this Docket No. ER99-28-000, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010.

Dated at Washington, D.C. on this 22nd day of October, 1998.

Sean A. Atkins

October 22, 1998

The Honorable David P. Boergers
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: Sierra Pacific Power Company
Docket No. ER99-28-000

Dear Secretary Boergers:

Enclosed for filing is one original and 14 copies of the Motion to Intervene of the California Independent System Operator Corporation in the above-referenced docket. An additional copy of the filing is also enclosed. Please stamp the additional copy with the date and time filed and return it to the messenger.

Thank you for your assistance in this matter.

Respectfully submitted,

Kenneth G. Jaffe
David B. Rubin
Sean A. Atkins

Attorneys for the California
Independent System Operator Corporation