## UNITED STATES OF AMERICA FEDERAL ENERGY REGULATORY COMMISSION

Champion International Corporation	)	
Bucksport Energy, L.L.C.	)	
	)	
vs.	)	Docket No. EL98-69-000
	)	
ISO-New England, Inc.	)	
New England Power Pool	)	
Central Maine Power Company	)	

## 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 August 14, 1998 Notice, the California Independent System Operator Corporation ("ISO") hereby moves to intervene in the captioned proceeding.

The ISO is a non-profit public benefit corporation organized under the laws of the State of California as the Independent System Operator for the California market. The ISO is 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 and Electric Company. The ISO therefore has a unique interest in any FERC proceedings that could affect the operation of Independent System Operators or the administration of transmission grids.

At issue in this proceeding are the proper practices and procedures by which new generation facilities can interconnect with the NEPOOL transmission grid administered by ISO-New England.

The ISO will be addressing similar interconnection issues in the California market. As such, the ISO has an interest in this proceeding which cannot adequately be represented by any other party.

Accordingly, the ISO respectfully requests that it be permitted to intervene herein with full rights of a party.

Please address communications concerning this filing to the following persons:

N. Beth Emery Vice President and General Counsel Roger E. Smith, Regulatory Counsel The California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630

Tel: (916) 351-2334 Fax: (916) 351-2350 Edward Berlin Kenneth G. Jaffe Sean A. Atkins Swidler Berlin Shereff Friedman, LLP 3000 K Street, N.W., #300 Washington, D.C. 20007

Tel: (202) 424-7504 Fax: (202) 424-7643

## **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,

N. Beth Emery
Vice President and General Counsel
Roger E. Smith, Regulatory Counsel
The California Independent
System Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630
Tel: (916) 351-2334

Fax: (916) 351-2350

Edward Berlin Kenneth G. Jaffe Sean A. Atkins Swidler Berlin Shereff Friedman, LLP 3000 K Street, N.W., #300 Washington, D.C. 20007 Tel: (202) 424-7504

Fax: (202) 424-7504

Date: September 8, 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. EL98-69-000, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010 (1997).

Dated at Washington, D.C. on this 8<sup>th</sup> day of September, 1998.

Sean A. Atkins