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

Sierra Pacific Power Company ) and ) Docket No. ER00-3188-000 Nevada Power Company )

## 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 July 24, 2000, Notice of Filing, the California Independent System Operator Corporation ("ISO") hereby moves to intervene in the above-captioned proceeding. 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\* Senior 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 Kenneth G. Jaffe David B. Rubin\* Rebecca A. Blackmer Swidler Berlin Shereff Friedman, LLP 3000 K Street, N.W., Suite 300 Washington, DC 20007 Tel: (202) 424-7500 Fax: (202) 424-7643

\* Individuals designated for service pursuant to Rule 203(b)(3), 18 C.F.R. § 385.203(b)(3).<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> In addition to Mr. Smith and Mr. Rubin, the ISO respectfully requests that Ms. Burns be included on the Official Service List. Mr. Smith and Ms. Burns work in separate buildings, and it would be of significant assistance to the ISO if both were included on the list.

#### II. BACKGROUND

On July 19, 2000, Sierra Pacific Power Company and Nevada Power Company (collectively "the Companies") tendered for filing a revised Joint Open Access Transmission Tariff in order to implement retail access in Nevada and to make certain other changes to reflect the current status of operations.

#### 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 & 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. The ISO is also responsible for coordinating operations with neighboring control areas. Accordingly, the ISO has a unique interest in this proceeding and 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 but reserves the right to do so regarding any further aspects of the proceeding ordered by the Commission. The ISO also reserves the right to file supplemental comments if warranted.

2

# 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,

Charles Robinson General Counsel Roger E. Smith Senior Regulatory Counsel The California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630 Kenneth G. Jaffe David B. Rubin Rebecca A. Blackmer Swidler Berlin Shereff Friedman, LLP 3000 K Street, N.W. Suite 300 Washington, DC 20007

Attorneys for the California Independent System Operator Corporation

Date: August 9, 2000

# 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 proceeding.

Dated at Washington, DC, on this 9<sup>th</sup> day of August, 2000.

Rebecca A. Blackmer

August 9, 2000

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

### Re: Sierra Pacific Power Company and Nevada Power Company Docket No. ER00-3188-000

Dear Secretary Boergers:

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

Respectfully submitted,

Rebecca Blackmer Swidler Berlin Shereff Friedman, LLP 3000 K Street, NW, Suite 300 Washington, DC 20007 Tel: (202) 424-7500 Fax: (202) 424-7643

Attorney for the California Independent System Operator Corporation