

California Independent System Operator Corporation

June 30, 2006

## Via Electronic Filing

The Honorable Magalie R. Salas Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, D.C. 20426

#### Re: San Diego Gas and Electric Company Docket No. ER06-1119-001

Dear Secretary Salas:

Transmitted herewith for electronic filing in the above-referenced proceedings is the Motion to Intervene of the California Independent System Operator Corporation.

Thank you for your attention to this matter.

Yours truly,

## /s/ Sidney Mannheim Davies

Sidney Mannheim Davies Assistant General Counsel Counsel for the California Independent System Operator Corporation

Enclosure cc: Service List

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

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San Diego Gas and Electric Company

Docket No. ER06-1119-001

### 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 June 29, 2006, Notice of Filing, the California Independent System Operator Corporation ("CAISO") submits this Motion to Intervene in the above captioned proceeding. In support thereof, the CAISO states as follows:

## I. DESCRIPTION OF THE PROCEEDING

On June 23, 2006, San Diego Gas and Electric Company (SDG&E) Palomar Energy Center ("Facility") submitted and Errata to the First Revised Sheet 158 filed on June 8, 2006 to revise Table D-0 of Schedule D to the Reliability Must-Run ("RMR") Service Agreement between SDG&E and CAISO.

By its Notice issued June 29, 2006, the Commission established July 14, 2006, as the comment date motions in the above-captioned proceeding.

## II. DESCRIPTION OF THE ISO AND COMMUNICATIONS

The CAISO is a non-profit public benefit corporation organized under the laws of the State of California with its principal place of business at 151 Blue Ravine Road, Folsom, CA 95630. The CAISO is the Control Area operator responsible for the reliable operation of the electric grid comprising the transmission systems of a number of utilities including Pacific Gas and Electric Company ("PG&E") and San Diego Gas & Electric Company ("SDG&E") as well

as the coordination of the ancillary services and real-time electricity markets in

California.

The CAISO requests that all communications and notices concerning this motion and these proceedings be provided to:

Sidney Mannheim Davies Assistant General Counsel California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630 Tel: (916) 608-7144 Fax: (916) 608-7222 E-mail: sdavies@caiso.com Robert C. Kott Manager of Model and Contract Implementation California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630 Tel: (916) 608-5804 Fax: (916) 351-2487 E-mail: rkott@caiso.com

### III. CAISO'S INTEREST

Palomar Energy Center ("Facility") is located within SDG&E's transmission system and is needed to maintain the reliability of the ISO Controlled Grid. Both facilities are needed to maintain the reliability of the ISO Controlled Grid. As the Control Area operator and as the counter party to the RMR Agreements, the CAISO has a unique interest in any Commission proceeding that affects an RMR Agreement. Accordingly, the CAISO has a direct and substantial interest in this proceeding and requests that it be permitted to intervene. Because no other party can adequately represent the CAISO's interests in this proceeding, the CAISO's intervention is in the public interest and should be granted.

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### IV. CONCLUSION

For the foregoing reasons, the CAISO respectfully requests that the Commission grant this Motion to Intervene and make the CAISO a party in the above-caption proceeding with full rights of participation.

Dated: June 30, 2006

Respectfully submitted

#### /s/ Sidney Mannheim Davies

Sidney Mannheim Davies California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630 (916) 608-7144 (tel) (916) 608-7222 (fax)

# **CERTIFICATE OF SERVICE**

I hereby certify that I have, this 30<sup>th</sup> day of June 2006, caused to be served a copy of the forgoing document upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

/s/ Sidney Mannheim Davies

Sidney Mannheim Davies