

California Independent System Operator Corporation

May 26, 2006

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

## Re: Governors of the States of Arizona, California, Colorado, Montana, Nevada, New Mexico, Oregon, Utah, Washington and Wyoming, Docket No. RR06-2-000

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

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

Governors of the States of Arizona, California,) Colorado, Montana, Nevada, New Mexico, Oregon, Utah, Washington and Wyoming

Docket No. RR06-2-000

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

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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 April 26, 2006 Notice of Filing, the California Independent

System Operator Corporation ("CAISO") hereby moves to intervene in the above-

captioned proceeding.

In support thereof, the CAISO states as follows:

#### I. COMMUNICATIONS

Please address communications concerning this filing to the following

person:

Anthony J. Ivancovich Assistant General Counsel-Regulatory California Independent System **Operator Corporation** 151 Blue Ravine Road Folsom, CA 95630 Tel: (916) 608-7135 Fax: (916) 608-7296 aivancovich@caiso.com

\*Individual designated for service pursuant to Rule 203 (b)(3), 18 C.F.R. § 203(b)(3)

#### II. BACKGROUND

On April 20, 2006, the Governors of the States of Arizona, California,

Colorado, Montana, Nevada, New Mexico, Oregon, Utah, Washington and

Wyoming filed a petition, pursuant to Section 215 of the Federal Power Act, to create a Regional Advisory Body for the Western Interconnection. The petitioners propose to organize the Western Interconnection Regional Advisory Body pursuant to a Policy Resolution of the Western Governors' Association.

By its Notice of Filing issued April 26, 2006, the Commission established May 26, 2006 as the date motions to intervene are to be filed in the abovecaptioned proceeding.

### III. BASIS FOR MOTION TO INTERVENE

The CAISO is a non-profit public benefit corporation organized under the laws of the State of California and is responsible for the reliable operation of a transmission grid comprised of transmission facilities owned by Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Trans-Elect NTD Path 15 LLC, and the Cities of Vernon, Anaheim, Azusa, Banning, Riverside and Pasadena, California. As the operator of this regional transmission grid, as well as the operator of organized electricity and Ancillary Services markets, the CAISO has a significant and unique interest in the captioned proceeding that cannot be adequately represented by any other party. Further, the CAISO will be impacted by any Commission action in this proceeding. Accordingly, the CAISO should be permitted to intervene with full rights as a party.

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## IV. CONCLUSION

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

Respectfully submitted,

### /s/ Anthony J. Ivancovich

Anthony J. Ivancovich Assistant General Counsel-Regulatory California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630 Tel: (916) 608-7135 Fax: (916) 608-7296

Counsel for the California Independent System Operator Corporation

Date: May 26, 2006

# 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 26<sup>th</sup> day of May 2006

<u>/s/ Anthony J. Ivancovich</u>

Anthony J. Ivancovich