

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

<b>El Paso Electric Company</b>	)	
<b>Enron Power Marketing, Inc.</b>	)	<b>Docket No. EL02-113-000</b>
<b>Enron Capital and</b>	)	
<b>Trade Resources Corporation</b>	)	

**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 “Order Initiating Investigation, and Establishing Hearing Procedures and Refund Effective Date” issued August 13, 2002, 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:

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## **II. BACKGROUND**

On August 13, 2002, the Commission ordered an investigation under section 206 of the Federal Power Act (FPA), 16 U.S.C. § 824e (1994), into instances of possible misconduct by El Paso Electric Company (“El Paso Electric”) and two affiliates of Enron Corporation -- Enron Power Marketing, Inc. (“EPMI”) and Enron Capital and Trade Resources Corporation (“Enron Capital”) (collectively, “Enron”)-- to determine whether misconduct occurred and, if so, to determine remedies, including possibly refunds and/or revocation of El Paso Electric’s and/or Enron’s market-based rate authority.

## **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, Southern California Edison Company, San Diego Gas & Electric Company and the City of Vernon. As the operator of this grid, the ISO believes that it has a unique interest in any Commission proceeding concerning the issues raised in the captioned proceeding.

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#### **IV. CONCLUSION**

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

Respectfully submitted,

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Counsel for the California Independent  
System Operator Corporation

Date: September 3, 2002



September 3, 2002

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

**Re: El Paso Electric Company, Enron Power Marketing,  
Enron Capital and Trade Resources Corporation  
Docket No. EL02-113-000**

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,

Anthony J. Ivancovich

Counsel for the California Independent  
System Operator Corporation

## **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 3rd day of September, 2002.

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Anthony J. Ivancovich