

ORIGINAL

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

FILED
OFFICE OF THE SECRETARY
01 NOV 30 AM 10:44
FEDERAL ENERGY
REGULATORY COMMISSION

Arizona Public Service Company)
El Paso Electric Company) Docket No. EL02-9-000
Public Service Company of)
New Mexico)
Tucson Electric Power Company)
WestConnect RTO, LLC)

**MOTION TO INTERVENE
OF THE CALIFORNIA INDEPENDENT OPERATOR CORPORATION**

Pursuant to Rules 211 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission"), 18 C.F.R. §§ 385.211, 385.214 (2001), and the Commission's October 24, 2001 Notice of Filing, the California Independent System Operator Corporation ("ISO") hereby moves to intervene in the above-captioned proceeding.

I. COMMUNICATIONS

Please address communications concerning this filing to the following persons:

Charles F. Robinson
Margaret A. Rostker
The California Independent System
Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630
Tel: (916) 351-2207
Fax: (916) 351-4436

Edward Berlin
David B. Rubin
Swidler Berlin Shereff Friedman, LLP
3000 K Street, NW - Suite 300
Washington, DC 20007-5116
Tel: (202) 424-7500
Fax: (202) 424-7643

II. BACKGROUND

On October 16, 2001, Arizona Public Service Company, El Paso Electric Company, Public Service Company of New Mexico, and Tucson Electric Power Company filed a petition for Declaratory Order seeking confirmation that their joint proposal to form

AD
DOCKETED

0112036497.1

WestConnect RTO, LLC meets or exceeds the Commission's requirements for the formation of RTOs under Order No. 2000. Pursuant to the notice issued October 24, 2001 and errata notice issued October 25, 2001, the ISO hereby moves for leave to intervene in this proceeding.

III. BASIS FOR MOTION TO INTERVENE

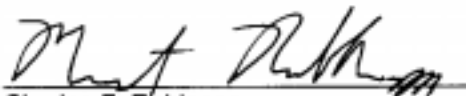
The ISO is a non-profit public benefit corporation organized under the laws of the State of California. It is responsible for the reliable operation of the transmission system of California for the three investor owned utilities in the state, as well as for the coordination of the competitive electricity market in California. As the entity responsible for the reliable operation of the transmission system listed above, the ISO has interest in this proceeding that cannot be adequately represented by any other party.

IV. CONCLUSION

The ISO therefore petitions to intervene as a party in this proceeding and that its designated representatives be added to the official service list. Correspondence and

communications concerning this proceeding should be directed to the undersigned counsel.

Respectfully submitted,



Charles F. Robinson,
Margaret A. Rostker
The California Independent System
Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630
Tel: (916) 351-2207
Fax: (916) 351-4436



Edward Berlin
David B. Rubin
D. Daniel Sokol
Swidler Berlin Shereff Friedman, LLP
3000 K Street, NW – Suite 300
Washington, DC 20007-5116
Tel: (202) 424-7500
Fax: (202) 424-7643


Counsel for the California Independent
System Operator Corporation

Dated: November 30, 2001

CERTIFICATE OF SERVICE

I hereby certify I have this day served this document upon to all persons on the official service list in Docket No. EL02-9-000, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Washington, D.C. this 30th day of November, 2001.


D. Daniel Sokol

