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

Western Interconnect, L.L.C.

Docket No. EL03-235-000

## 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 October 16, 2003 Notice of Filing, the California

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Independent System Operator Corporation ("ISO")<sup>1</sup> 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:

Anthony J. Ivancovich Senior Regulatory Counsel Stephen T. Greenleaf Director of Regulatory Policy California ISO 151 Blue Ravine Road Folsom, CA 95630 Tel: (916) 608-7135 Fax: (916) 608-7296 David B. Rubin Swidler Berlin Shereff Friedman, LLP 3000 K Street, N.W., Suite 300 Washington, D.C. 20007 Tel: (202) 424-7500 Fax: (202) 424-7643

<sup>&</sup>lt;sup>1</sup> Capitalized terms not otherwise defined herein are defined in the Master Definitions Supplement, Appendix A to the ISO Tariff, as filed August 15, 1997, and subsequently revised.

### II. BACKGROUND

On September 30, 2003, Western Interconnect, L.L.C. tendered for filing a petition for Declaratory Order seeking confirmation of their proposal to establish a Regional Transmission Organization (RTO) that covers the entire Western Interconnect.

By its Notice issued October 16, 2003, the Commission established October 30, 2003 as the date motions to intervene are to be filed in the abovecaptioned 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 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 Cities of Vernon, Anaheim, Azusa, Banning and Riverside, California. 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.

2

# V. 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,

Anthony J. Ivancovich Senior Regulatory Counsel 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: October 30, 2003

# **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 30th day of October, 2003.

Anthony J. Ivancovich



October 30, 2003

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

## Re: Western Interconnect, L.L.C. Docket No. EL03-235-000

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