



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

Southern California Edison Company) Docket No. ER02-238-000

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

Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R.

§§ 385.212 and 385.214, and the Commission’s November 6, 2001 Notice of Filing, 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 November 1, 2001, Southern California Edison Company ("Edison") tendered for filing its 2002 Reliability Services Charge True-Up Filing ("Edison Filing") in order to revise its Transmission Owner Tariff ("TO Tariff"). Edison states that the proposed revisions change Edison's rates charged for Reliability Services, to account for Edison costs related to Reliability Must-Run Contracts between generators and the ISO ("RMR Contracts") and ISO dispatches of resources "Out-of-Market" due to a transmission outage or a location specific requirement ("Local OOM"). Edison states that pursuant to Edison's TO Tariff, Edison is to revise its Reliability Services Revenue Requirement and Reliability Services rates annually through a "RS True-up filing" to be effective for service rendered on and after January 1, and that the Edison Filing is the first RS True-up filing.

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 transmission grid comprising the systems of Pacific Gas and Electric Company, Edison, and San Diego Gas & Electric Company. The rate revisions requested by Edison relate to RMR Contracts between generators and the ISO, and to Local OOM calls made by the ISO. The ISO believes that it has a unique interest in any Commission proceeding concerning charges related to RMR Contracts between generators and the ISO and Local OOM calls made by the ISO.

Accordingly, the ISO requests that it be permitted to intervene herein with full rights as a party.

The ISO reserves the right to raise substantive issues regarding any further aspects of the proceeding ordered by the Commission. The ISO also reserves the right to file supplemental comments if warranted.

IV. CONCLUSION

Wherefore, 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: November 21, 2001

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 21th day of November, 2001.

Jeanne M. Solé



November 21, 2001

The Honorable David P. Boergers
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: **Southern California Edison Company**
Docket No. ER02-238-000

Dear Secretary Boergers:

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,

Jeanne M. Solé

Counsel for The California Independent
System Operator Corporation