UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

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San Diego Gas & Electric Company

Docket No. ER04-1017-000

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 July 16, 2004, 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:

Anthony J. Ivancovich Senior Regulatory Counsel Deborah A. LeVine, Director of Contracts & Special Projects California Independent System Operator Corporation 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

II. BACKGROUND

On July 14, 2004, San Diego Gas & Electric Company (SDG&E) submitted various revisions to its Transmission Owner Tariff, FERC Electric Tariff, Original Volume No. 11 (TO Tariff), to make ministerial changes regarding the term "Reliability Services;" to incorporated and provide for pass through to its customers reallocation of Must Offer Obligation/Minimum Load Compensation Cost related changes from the CAISO; and to seek an interim increase in Reliability Services rates to address unexpected under-collections and anticipated year 2005 forecast increases. SDG&E requests an effective date of July 14, 2004, for the ministerial changes, and effective date as early as July 17, 2004, for Must Offer Obligation/Minimum Load Compensation Costs related charges, and an effective date of October 1, 2004, for the Reliability Services rates increase.

By its Notice issued July 16, 2004, the Commission established August 4, 2004, as the date motions to intervene are to be filed in the above-captioned 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

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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.

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,

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

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: August 4, 2004

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 4th day of August 2004.

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



August 4, 2004

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

Re: San Diego Gas & Electric Company Docket No. ER04-1017-000

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