

September 21, 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. ER04-1163-000

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

# UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

| San Diego Gas & Electric | )                          |
|--------------------------|----------------------------|
| Company                  | ) Docket No. ER04-1163-000 |
|                          | )                          |

# 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 September 7, 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
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Folsom, CA 95630

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#### II. BACKGROUND

As stated in the September 7, 2004, notice of filing, on August 31, 2004, San Diego Gas & Electric Company (SDG&E) tendered for filing revisions to its Transmission Owner Tariff, FERC Electric Tariff, Original Volume No. 11, to reflect proposed revisions to SDG&E's Transmission Formula Rate. SDG&E requests an effective date of September 1, 2004, for the proposed revisions.

By its Notice issued September 7, 2004, the Commission established September 21, 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 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. Accordingly, the ISO respectfully requests that it be permitted to intervene herein with full rights as a party.

#### 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,

## /s/ Anthony J. Ivancovich

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Counsel for the California Independent System Operator Corporation

Date: September 21, 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 21st day of September 2004.

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