

October 12, 2004

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

# Re: Southern California Edison Company Docket No. ER04-1235-000

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,

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

Counsel for the California Independent System Operator Corporation

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

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Southern California Edison Company

Docket No. ER04-1235-000

### 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 23, 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 September 21, 2004, Southern California Edison Company (SCE) submitted for filing a Service Agreement for Wholesale Distribution Service (WDAT Service Agreement), Service Agreement No. 125 under the Wholesale Distribution Access Tariff, FERC Electric Tariff, First Revised Volume No. 5, between SCE and the City of Corona, California (Corona). SCE states that the purpose of the WDAT Service Agreement is to specify the terms and conditions under which SCE will provide Wholesale Distribution Service from the CAISO Controlled Grid at SCE's Mira Loma Substation to a SCE-Corona 12 kV interconnection serving a new development known as Corona Dos Lagos.

By its Notice issued September 23, 2004, the Commission established October 12, 2004, 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

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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.

## 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

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 12, 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 12th day of October 2004.

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