

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

**City of Vernon, California) Docket No. EL03-31-000
)**

**MOTION TO INTERVENE OUT-OF-TIME 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 December 13, 2002 Notice of Filing, the California Independent System Operator Corporation (“ISO”) hereby moves to intervene out-of-time 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 December 9, 2002, the City of Vernon, California tendered for filing the annual update to its Transmission Revenue Balancing Account Adjustment (TRBA Adjustment) and to Appendix I of its Transmission Owner Tariff (TO Tariff), to reflect that update.

By its Notice issued December 13, 2002, the Commission established January 8, 2003 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. Because Vernon is a Participating Transmission Owner and its revenue requirement is reflected in the ISO's Transmission Access Charge, the ISO has a unique interest in any Commission proceeding concerning the issues raised in the captioned proceeding.

Due to the press of a number of significant regulatory matters, the ISO was unable to file its intervention in a timely manner. The ISO requests that it be allowed to intervene out-of-time because it has a significant interest in this matter and its unique interest cannot be adequately represented by any other party. A

late-filed intervention by the ISO should not prejudice any party or delay the proceedings herein because such proceeding is only in its infant stages and the Commission has not yet issued an order on Vernon's filing.

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,

Anthony J. Ivancovich
Senior Regulatory Counsel
California Independent System
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Counsel for the California Independent
System Operator Corporation

Date: January 17, 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 17th day of January, 2003.

Anthony J. Ivancovich



January 17, 2003

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

Re: **City of Vernon, California**
Docket No. EL03-31-000

Dear Secretary Salas:

Enclosed please find an electronic filing of the Late Filed 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