

November 24, 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. ER05-170-000

Dear Secretary Salas:

Enclosed please find an electronic filing of the Motion to Intervene One Day Out-Of-Time 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. ER05-170-000

MOTION TO INTERVENE ONE DAY 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 November 10, 2004 Notice of Filing, the California

Independent System Operator Corporation ("ISO") hereby moves to intervene

one day 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:

Anthony J. Ivancovich* Senior Regulatory Counsel Deborah A. Le Vine ¹ Director of Contracts California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630 Tel: (916) 608-7135 Fax: (916) 608-7296 aivancovich@caiso.com dlevine@caiso.com 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

*Individual designated for service pursuant to Rule 203 (b)(3), 18 C.F.R. § 203(b)(3)

II. BACKGROUND

On November 2, 2004, Southern California Edison (SCE) submitted for filing the following agreements between SCE and State of California Department of Water Resources (CDWR) under FERC Electric Tariff, Second Revised Volume No. 6: Edmonston Pumping Plant Interconnection Facilities Agreement, Service Agreement No. 31; Pearblossom Pumping Plant Interconnection Facilities Agreement, Service Agreement No. 32; Oso Pumping Plant Interconnection Facilities Agreement, Service Agreement No. 33; William E. Warne Power Plant Interconnection Facilities Agreement, Service Agreement No. 34; and Alamo Power Plant Interconnection Facilities Agreement, Service Agreement No. 35. SCE also submitted the Devil Canyon Service Agreement for Wholesale Distribution Service, Service Agreement No. 126, under FERC Electric Tariff, First Revised Volume No. 5. SCE requests an effective date of January 1, 2005.

¹ In addition to Mr. Ivancovich and Mr. Rubin, the ISO respectfully requests that Ms. Le Vine be included in the Official Service List. Mr. Ivancovich and Ms. Le Vine work in separate buildings, and it would be of significant assistance to the ISO if both were included on the list.

By its Notice issued November 10, 2004, the Commission established November 23, 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 comprising the transmission systems of PG&E, 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.

III. MOTION TO INTERVENE OUT OF TIME

Due to an administrative oversight, the ISO failed to file this motion by the date specified in the November 10, 2004 Notice of Filing. Given the early status of the proceeding, however, no party will be prejudiced by the granting of the motion.

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V. 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: November 24, 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 24th day of November 2004.

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