

October 15, 2008

### **VIA ELECTRONIC FILING**

The Honorable Kimberly D. Bose Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, D.C. 20426

Re: Southern California Edison Company Docket No. ER08-1567-000

Dear Secretary Bose:

Transmitted herewith for electronic filing in the above-referenced proceeding is the Motion to Intervene of the California Independent System Operator Corporation.

Thank you for your attention to this matter.

Yours truly,

/s/ Michael D. Dozier

Michael D. Dozier Senior Counsel

Counsel for the California Independent System Operator Corporation

Enclosure cc: Service List

# UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

Southern California Edison	)	Docket No.	ER08-1567-000
Company	)		

# 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 26, 2008, Combined Notice of Filings, the California Independent System Operator Corporation ("CAISO") submits this Motion to Intervene in the above captioned proceeding. In support thereof, the CAISO states as follows:

#### I. DESCRIPTION OF THE PROCEEDING

On September 24, 2008, Southern California Edison Company ("SCE") submitted to the Commission a Generation Interconnection Process Reform ("GIPR") Tariff Amendment for its Wholesale Distribution Access Tariff.

By its notice issued September 26, 2008, the Commission established October 15, 2008, as the date motions to intervene are to be filed in the above-captioned proceeding.

#### II. DESCRIPTION OF THE CAISO AND COMMUNICATIONS

The CAISO is a non-profit public benefit corporation organized under the laws of the State of California with a principal place of business at 151 Blue Ravine Road, Folsom, CA 95630. The CAISO is the Control Area operator responsible for the reliable operation of the electric grid comprising the

transmission systems of a number of utilities, as well as the coordination of the ancillary services and real-time electricity markets in California.

The CAISO requests that all communications and notices concerning this motion and these proceedings be provided to:

Michael D. Dozier Senior Counsel California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630 916-608-7048 (tel) 916-608-7222 (fax) mdozier@caiso.com Stephen Rutty
Manager, Grid Assets
California Independent System
Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630
916-351-2126 (tel)

srutty@caiso.com

#### III. CAISO'S INTEREST

The CAISO has recently submitted and had accepted by the Commission, subject to a compliance filing, its own GIPR tariff amendment to the CAISO Tariff. SCE's GIPR tariff amendment is intended to operate in coordination with the CAISO's GIPR tariff amendment.

Accordingly, the CAISO has a direct and substantial interest in this proceeding and requests that it be permitted to intervene. Because no other party can adequately represent the CAISO's interests in this proceeding, the CAISO's intervention is in the public interest and should be granted.

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IV. **CONCLUSION** 

For the foregoing reasons, the CAISO respectfully requests that the

Commission grant this Motion to Intervene and make the CAISO a party in the

above-captioned proceeding with full rights of participation.

Dated: October 15, 2008

Respectfully submitted

/s Michael D. Dozier

Michael D. Dozier

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## **CERTIFICATE OF SERVICE**

I hereby certify that I have this 15<sup>th</sup> day of October, 2008 caused to be served a copy of the forgoing document upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

<u>Isl Anna Pascuyyo</u> Anna Pascuzzo