

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

Southern California Edison Company)
) **Docket No. ER02-1383-000**
)

**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 March 28, 2002 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:

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II. BACKGROUND

Whitewater Energy Corporation (Whitewater) and Southern California Edison Company (SCE) are negotiating the terms of a comprehensive interconnection facilities agreement, containing the terms for SCE to construct and Whitewater to pay for interconnection facilities. However, in the interest of timely completion of facilities to meet the May 15, 2002 operating date requested by Whitewater, Whitewater desires SCE to commence construction of the interconnection facilities.

On March 26, 2002, SCE tendered for filing a Letter Agreement between SCE and Whitewater. The Letter Agreement provides for an interim arrangement pursuant to which SCE will begin construction of the interconnection facilities necessary to interconnect the Whitewater project to SCE's distribution system.

By its Notice issued March 28, 2002, the Commission established April 16, 2002 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 City of Vernon. 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,

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

Date: April 16, 2002



April 16, 2002

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. ER02-1383-000

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,

Anthony J. Ivancovich
Counsel for the California Independent
System Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630

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 16th day of April, 2002.

Anthony J. Ivancovich