



December 27, 2004

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. EL05-40-000

Dear Secretary Salas:

Enclosed please find an electronic filing of the Motion to Intervene and Comment of the California Independent System Operator Corporation.

Thank you for your attention to this filing.

Respectfully submitted,

/s/ Anthony J. Ivancovich
Anthony J. Ivancovich

Counsel for the California Independent
System Operator Corporation

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

City of Vernon, California)	
)	Docket No. EL05-40-000
)	

**MOTION TO INTERVENE AND COMMENT 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 6, 2004, Notice of Filing, the California Independent System Operator Corporation (“ISO”) hereby moves to intervene in the above-captioned proceeding.¹ In support thereof, the ISO states as follows:

I. COMMUNICATIONS

Please address communications concerning this filing to the following persons:

¹ Capitalized terms not otherwise defined herein are defined in the Master Definitions Supplement, Appendix A to the ISO Tariff, as filed August 15, 1997, and subsequently revised.

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

II. BACKGROUND

On December 7, 2004, the City of Vernon, California ("Vernon") submitted for filing changes to its Transmission Revenue Balancing Account Adjustment ("TRBAA") and Appendix I of its Transmission Owner (TO) Tariff. Vernon requests a January 1, 2005, effective date for its filing. Vernon further requests that the Commission waive any fees for the filing of its revised TRBAA.

By its Notice issued December 10, 2004, the Commission established December 28, 2004, 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 and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company,

² 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.

Trans-Elect NTD Path 15 LLC, Western Area Power Administration - Sierra Nevada Region 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. COMMENT

Vernon filed their Net FTR Revenue calculation as being \$ 177,051.79 in Exhibit 4. The Net FTR Revenue figure as calculated by the ISO is \$ 177,051.09 or a difference of \$ 0.70 reflected in Vernon's calculation of its TRBAA for 2005. The two numbers are slightly different, less than one (1) dollar, and attributable to rounding. The ISO does not believe that the difference is a significant enough difference to warrant revisions to Vernon's TRBAA.

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

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Date: December 27, 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 27th day of December 2004.

/s/ Anthony J. Ivancovich
Anthony J. Ivancovich