



ER08-960 with regard to the provisions of the CAISO Tariff relating to the CAISO's LGIP and LGIA in conjunction with the CAISO's "Generator Interconnection Process Reform" ("GIPR"). The CAISO has subsequently submitted its GIPR filing to the Commission in Docket No. ER08-1318. The CAISO agrees with and supports the SCE Waiver Petition as appropriately coordinating SCE's WDAT LGIP and LGIA interconnection process with the CAISO's GIPR proposal. The CAISO Controlled Grid is invariably an Affected System in all SCE WDAT Interconnection Studies. In addition, SCE WDAT projects that want to be counted as Resource Adequacy Resources pursuant to the CAISO Tariff need to be included in the CAISO's Deliverability Assessments. In order to most efficiently process these studies, the SCE WDAT process should be on the same timeline and the projects should have the same financial commitments as Interconnection Studies under the CAISO's proposed new GIPR LGIP Clustering approach.

## **II. BASIS FOR MOTION TO INTERVENE**

The CAISO is a non-profit public benefit corporation organized under the laws of the State of California. The CAISO is responsible for the reliable operation of a grid comprising the transmission systems of SCE, San Diego Gas & Electric Company, Pacific Gas and Electric Company, the Cities of Vernon, Pasadena, Anaheim, Azusa, Banning, and Riverside, California, Startrans IO, L.L.C., and, with regard to the Path 15 transmission lines in California, Atlantic

Path 15, LLC (formerly Trans-Elect NTD Path 15, LLC) and the Western Area Power Administration, Sierra Nevada Region.

The CAISO Tariff governs the Commission-jurisdictional interconnection of facilities to the CAISO Controlled Grid, similar to the Commission-jurisdictional interconnection of facilities to SCE's Distribution System at issue in this proceeding. As such, the CAISO has a significant interest in this proceeding that cannot adequately be represented by any other party. The CAISO therefore requests that it be permitted to intervene in this proceeding.

### **III. COMMUNICATIONS**

Please address all communications concerning this proceeding to the following persons:

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#### IV. CONCLUSION

Wherefore, the CAISO respectfully requests that the Commission grant its motion to intervene and grant SCE's Waiver Petition, subject to the comments set forth herein.

Respectfully submitted,

/s/ Michael D. Dozier

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Dated: August 25, 2008

## CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceeding, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California this 25<sup>th</sup> day of August, 2008.

*Asl Anna Pascuzzo*

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