



January 7, 2005

The Honorable Magalie Roman Salas  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

Re: **City of Riverside, California**  
**Docket No. EL05-45-000**

Dear Secretary Salas:

Enclosed please find an electronic filing of the Motion to Intervene and Comment One Day Out of Time 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 Riverside, California     )**  
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**Docket No. EL05-45-000**

**MOTION TO INTERVENE ONE DAY OUT OF TIME 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 23, 2004, Notice of Filing, the California Independent System Operator Corporation (“ISO”) hereby moves to intervene and comment in the above-captioned proceeding.<sup>1</sup> In support thereof, the ISO states as follows:

**I.       COMMUNICATIONS**

Please address communications concerning this filing to the following persons:

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<sup>1</sup> 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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Senior Regulatory Counsel  
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## II. BACKGROUND

On December 16, 2004, the City of Riverside, California ("Riverside") submitted for filing changes to its Transmission Revenue Balancing Account Adjustment ("TRBAA") and Appendix I of its Transmission Owner (TO) Tariff. Riverside requests a January 1, 2005, effective date for its filing. Riverside further requests that the Commission waive any fees for the filing of its revised TRBAA.

By its Notice issued December 23, 2004, the Commission established January 6, 2005, 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,

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<sup>2</sup> 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.

Southern California Edison Company, San Diego Gas & Electric Company, Trans-Elect NTD Path 15 LLC, Western Area Power Administration - Sierra Nevada Region and the Cities of Vernon, Anaheim, Azusa, Banning Riverside and Pasadena, 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**

Riverside filed their Net FTR Revenue calculation as being \$ 105,096.00 in Exhibit RIV-1. However, the Net FTR Revenue figure as calculated by the ISO is \$ 105,099.02 as is evidenced in Exhibit RIV-4. The difference in the two calculations is \$ 3.02, which is minimal, but the ISO has no idea as to the reasoning for the difference.

**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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Counsel for the California Independent  
System Operator Corporation

Date: January 7, 2005

## 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 7<sup>th</sup> day of January, 2005.

**/s/ Anthony J. Ivancovich**

Anthony J. Ivancovich