



February 21, 2006

VIA ELECTRONIC FILING

The Honorable Magalie R. Salas
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Re: San Diego Gas and Electric Company
Docket No. ER06-577-000**

Dear Secretary Salas:

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

Thank you for your attention to this matter.

Yours truly,

/s/ Sidney Mannheim Davies

Sidney Mannheim Davies
Assistant General Counsel
Counsel for the California Independent
System Operator Corporation

Enclosure

cc: Service List

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

**San Diego Gas and
Electric Company**

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Docket No. ER06-577-000

**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 February 8, 2006, Notice of Filing, 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 January 30, 2006, San Diego Gas and Electric Company (“SDG&E”) submitted an executed Reliability Must-Run Service Agreement (“RMR Agreement”) and accompanying schedules between SDG&E and CAISO for filing with the Commission for the Palomar Energy Center Facility (“Palomar Facility”). SDG&E requests that the Commission accept these rate schedules and place them into effect as of the later of: (1) April 1, 2006; or (2) the first day of the month following the date of commercial operation on which SDG&E acquires through a leasehold interest care, custody, and control of Palomar Facility under a Turnkey Acquisition Agreement, dated January 29, 2004, with Palomar Energy, LLC.

By its Notice issued February 8, 2006, the Commission established February 21, 2006, as the date motions to intervene are to be filed in the above-captioned proceeding.

II. DESCRIPTION OF THE ISO AND COMMUNICATIONS

The CAISO is a non-profit public benefit corporation organized under the laws of the State of California with its 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 including SDG&E, the Responsible Utility under the RMR Agreement, 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:

Sidney Mannheim Davies
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California Independent System
Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630
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III. CAISO'S INTEREST

The Palomar Facility is located within SDG&E's transmission system and is needed to maintain the reliability of the ISO Controlled Grid. As the Control Area operator and as the counter party to the RMR Agreement, the CAISO has a unique interest in any Commission proceeding that affects an RMR Agreement.

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.

IV. STATEMENT OF ISSUES

The CAISO seeks to intervene in this proceeding with all the rights attendant to such status.

V. 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-caption proceeding with full rights of participation.

Dated: February 21, 2006

Respectfully submitted

/s/ Sidney Mannheim Davies
Sidney Mannheim Davies
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Operator Corporation
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Folsom, CA 95630
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CERTIFICATE OF SERVICE

I hereby certify that I have, this 21st day of February 2006, 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.

/s/ Sidney Mannheim Davies
Sidney Mannheim Davies