

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

Southern California Edison Company)

Docket No. EL11-10-000

**MOTION TO INTERVENE AND COMMENTS OF THE CALIFORNIA
INDEPENDENT SYSTEM OPERATOR CORPORATION**

The California Independent System Operator Corporation submits this motion to intervene and comments on the petition for declaratory order filed by Southern California Edison Company on December 9, 2010 in this proceeding.¹ SCE's petition requests the Commission's approval of SCE's recovery of any costs of abandoned plant and other rate incentives for four proposed transmission projects:

(1) expansion of Colorado River substation, (2) expansion of Whirlwind substation, (3) the South of Kramer transmission project, and (4) the West of Devers transmission project. Very similar issues have been raised in the proceedings on SCE's petitions for similar rate incentives for its proposed Lugo-Pisgah transmission project and the Red Bluff substation in Docket No. EL10-81 and its proposed Eldorado-Ivanpah transmission project in Docket No. EL10-1.

I. COMMENTS

As the ISO proposed in its September 3, 2010 comments in Docket No. EL10-81 and its November 2, 2009 comments in Docket No. EL10-1, the ISO also proposes in this proceeding that the Commission make any approval of SCE's request for recovery of abandoned plant costs conditional on the ISO's approval of

¹ This motion and comments are submitted pursuant to Rules 212 and 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. §§ 385.212, 385.214 (2010) and the Notice of Filing issued in this proceeding on December 17, 2010. The ISO is sometimes also referred to as the CAISO.

the four SCE transmission projects through execution of Large Generator Interconnection Agreements that specify the need for these facilities as network upgrades in those LGIAs. In the ISO's additional comments submitted in Docket No. EL10-1 on August 24, 2010, the ISO clarified the relationship of the ISO's generator interconnection process to its transmission planning process. The ISO incorporates all of its comments in Docket No. EL10-1 herein by reference.

II. MOTION TO INTERVENE

The ISO is a non-profit public benefit corporation organized under the laws of the State of California, with a principal place of business at 151 Blue Ravine Road, Folsom, CA 95630. The ISO is a balancing authority responsible for the operation of transmission facilities placed under the ISO's operational control pursuant to a Transmission Control Agreement between the ISO and participating transmission owners. The ISO conducts a generator interconnection process pursuant to Commission-approved generator interconnection provisions of the ISO tariff.²

The petition requests incentives for proposed transmission facilities that are currently being evaluated under the ISO's generator interconnection process, which may affect the transmission rates that the ISO collects under its tariff. No other party can adequately represent the ISO's interests. Accordingly, the ISO requests the Commission's permission to intervene with full rights of a party.

² ISO tariff section 25.1 and appendices S, T, U, V, W, Y, Z, BB, and CC.

III. COMMUNICATIONS

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

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18 C.F.R. § 203(b)(3).

IV. CONCLUSION

The ISO respectfully requests that the Commission grant its motion to intervene in this proceeding, allow the ISO to participate in the proceeding with full rights as a party thereto, and act on the petition in a manner consistent with the comments filed herein.

Respectfully submitted,

By: /s/ Michael D. Dozier

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Dated: January 10, 2011

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of this document upon all parties listed on the official service list compiled by the Secretary in the above-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 this 10th day of January, 2011, at Folsom, California.

Susan L. Montana

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