



January 11, 2006

**Via Electronic Filing**

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

**Re: Trans-Elect NTD Path 15, LLC  
Docket No. ER06-364-000**

Dear Secretary Salas:

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

Thank you for your attention to this filing.

Respectfully submitted,

**/s/ Sidney Mannheim Davies**

Sidney Mannheim Davies  
Counsel for the California Independent  
System Operator Corporation

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

<b>Trans-Elect NTD</b>	)	
<b>Path 15, LLC</b>	)	<b>Docket No. ER06-364-000</b>
	)	

**MOTION TO INTERVENE AND PROTEST 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 30, 2005, Notice of Filing, the California Independent System Operator Corporation (“CAISO”) hereby moves to intervene and protest in the above-captioned proceeding.<sup>1</sup> In support thereof, the CAISO 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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**\*Individual designated for service pursuant to Rule 203 (b)(3), 18 C.F.R. § 203(b)(3)**

## **II. BACKGROUND**

On December 21, 2005, Trans-Elect NTD Path 15, LLC (Trans-Elect) submitted First Revised Sheet No. 16 to FERC Electric Tariff, Original Volume No. 1. By its Notice issued December 30, 2005, the Commission established January 11, 2006, as the date motions to intervene are to be filed in the above-captioned proceeding.

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

The CAISO is a non-profit public benefit corporation organized under the laws of the State of California and is 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, Trans-Elect NTD Path 15 LLC, Western Area Power Administration - Sierra Nevada Region and the Cities of Vernon, Anaheim, Azusa, Banning, Riverside

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<sup>2</sup> In addition to Ms. Davies and Mr. Ward, the ISO respectfully requests that Ms. Le Vine be included on the Official Service List. Ms. Davies 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.

and Pasadena, California. Accordingly, the CAISO a unique interest in any Commission proceeding concerning the issues raised in the captioned proceeding.

#### **IV. STATEMENT OF ISSUES**

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

2. Trans-Elect's filing contains factual errors and is inconsistent with the ISO Tariff.

#### **V. PROTEST**

Trans-Elect in the filing of its Transmission Revenue Balancing Account Adjustment for 2006 made two errors in the calculation. First, Trans-Elect states that it did not receive Congestion revenue, and it did. Second, the calculation was not consistent with Appendix F, Schedule 3, Section 6.1(b) of the ISO Tariff. The CAISO has been working with Trans-Elect to resolve these issues but had not completed discussions prior to the deadline for the intervention, thus it is being filed out of an abundance of caution.

#### **VI. 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.

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Respectfully submitted,

**/s/ Sidney Mannheim Davies**

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Counsel for the California Independent  
System Operator Corporation

Date: January 11, 2006

## **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 11<sup>th</sup> day of January, 2006.

**/s/ Sidney Mannheim Davies**  
Sidney Mannheim Davies