

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

Startrans IO, L.L.C.) Docket No. ER08-413-000

**MOTION FOR LEAVE TO INTERVENE OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214, and the Combined Notice of Filing issued on January 10, 2008, the California Independent System Operator Corporation ("CAISO")¹ submits this motion to intervene concerning the January 4, 2008, application filed by Startrans IO, L.L.C. ("Startrans") for approval of a Transmission Revenue Requirement ("TRR") to be included in the CAISO's transmission Access Charge and Wheeling Access Charge ("Access Charges").

I. 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 – in addition to the City of Vernon – Southern California Edison Company, San Diego Gas & Electric Company, Pacific Gas and Electric Company, the Cities of Pasadena, Anaheim, Azusa, Banning, and Riverside, California, and, with regard to the Path 15 transmission lines in California, Atlantic Path 15, LLC (formerly Trans-Elect NTD

¹ Capitalized terms not otherwise defined herein have the meanings set forth in the Master Definitions Supplement, Appendix A to the ISO Tariff.

Path 15, LLC) and the Western Area Power Administration, Sierra Nevada Region.

In addition to the CAISO having operational control of the Vernon facilities, Startrans intends to become a Participating TO in the CAISO. For these reasons, the CAISO has an interest in these proceedings that no other party could represent. The CAISO therefore requests that it be allowed to intervene.

II. COMMENTS

The CAISO understands that Startrans will be making a filing today that agrees to extend until February 1, 2008, the CAISO's right to comment on its TRR filing. Accordingly, the CAISO is not filing substantive comments today, and will instead use the additional time to try to resolve certain issues with Startrans and Vernon. The CAISO reserves its right, however, to file comments no later than February 1, 2008, on any unresolved issues.

III. COMMUNICATIONS

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

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Counsel for the California Independent System Operator Corporation

* Individuals designated for service pursuant to Rule 203(b)(3), 18 C.F.R. § 203(b)(3).

IV. CONCLUSION

Wherefore, the CAISO respectfully requests that the Commission grant its motion to intervene, and accept any comments that the CAISO files no later than February 1, 2008.

Respectfully submitted,

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Counsel for the California Independent
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Dated: January 25, 2008

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 25th day of January in the District of Columbia.

/s/ Michael Kunselman

Michael Kunselman