

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

Sierra Pacific Power Company)	
Nevada Power Company)	Docket No. ER00-1801-000
Portland General Electric Company)	

**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 March 8, 2000, Notice of Filing, the California Independent System Operator Corporation (“ISO”) hereby moves to intervene in the above-captioned proceeding. In support thereof, the ISO states as follows:

I. COMMUNICATIONS

Please address communications concerning this filing to the following persons:

Roger E. Smith, Senior Regulatory Counsel The California Independent System Operator Corporation 151 Blue Ravine Road Folsom, CA 95630 Tel: (916) 351-2207 Fax: (916) 351-4436	Edward Berlin David B. Rubin Julia Moore Swidler Berlin Shereff Friedman, LLP 3000 K Street, NW, Suite 3000 Washington, DC 20007 Tel: (202) 424-7500 Fax: (202) 424-7643
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II. BACKGROUND

On March 3, 2000, Sierra Pacific Power Company (“Sierra”), Nevada Power Company (“Nevada Power”) and Portland General Electric Company (“PGE”) (together, “the Applicants”) tendered for filing with the Commission a Joint Open Access

Transmission Tariff (“Joint OATT”) in connection with the proposed acquisition of PGE by Sierra Pacific Resources, the holding company parent of Sierra and Nevada Power. The Joint OATT will apply to the transmission service provided by the Applicants when the acquisition has taken place.

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, San Diego Gas & Electric Company, and Southern California Edison Company, as well as for the coordination of the competitive electricity market in California. The ISO is vitally interested in the rate structures of entities doing business both within California and with ISO participants. This being the case, the ISO has an interest in the proceeding that cannot adequately be represented by any other party. Accordingly, the ISO requests that it be permitted to intervene herein with full rights of a party.

The ISO raises no substantive issues at the present time but reserves the right to do so in any further aspects of the proceeding ordered by the Commission. The ISO also reserves the right to file supplemental comments if warranted.

IV. CONCLUSION

Wherefore, for the foregoing reasons, the ISO respectfully requests that the Commission permit it to intervene, and that it be accorded full party status in this proceeding.

Respectfully submitted,

Roger E. Smith, Regulatory Counsel
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Operator Corporation
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Counsel for the California Independent
System Operator Corporation

Date: March 24, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, DC, on this 24th day of March, 2000.

Julia Moore

March 24, 2000

The Honorable David P. Boergers
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Re: Sierra Pacific Power Company, Nevada Power Company
and Portland General Electric Company,
Docket No. ER00-1801-000**

Dear Secretary Boergers:

Enclosed for filing are one original and 14 copies of the Motion to Intervene of the California Independent System Operator Corporation in the above-referenced proceeding. Two additional copies of the filing are also enclosed. Please stamp the two additional copies with the date and time filed and return them to the messenger.

Thank you for your assistance in this matter.

Respectfully submitted,

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