# UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

Southern California Edison Company	) Docket No. ER04-890-000 )
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	)

# 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 June 4, 2004 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:

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Senior Regulatory Counsel
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#### II. BACKGROUND

On May 28, 2004, Southern California Edison Company (SCE) tendered for filing a revision to its Transmission Owner Tariff (TO Tariff), FERC Electric Tariff, Second Revised Volume No. 6. SCE states that the revisions modify the TO Tariff by revising the definition of Reliability Services to reflect a new category of Reliability Services costs to be imposed by the ISO on Participating Transmission Owners (PTOs) in the ISO.

By its Notice issued June 4, 2004, the Commission established June 18, 2004, as the date motions to intervene are to be filed in the above-captioned proceeding.

#### 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 & Electric Company, Southern California Edison Company, San Diego Gas & Electric Company and the Cities of Vernon, Anaheim, Azusa, Banning and Riverside, California. As the

operator of this grid, the ISO believes that it has a unique interest in any Commission proceeding concerning the issues raised in the captioned proceeding.

### IV. 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.

Respectfully submitted,

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Counsel for the California Independent System Operator Corporation

Date: June 18, 2004

## **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 18th day of June 2004.

Anthony J. Ivancovich



June 18, 2004

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

Re: Southern California Edison Company Docket No. ER04-890-000

Dear Secretary Salas:

Enclosed please find an electronic filing of the Motion to Intervene of the California Independent System Operator Corporation. Thank you for your attention to this filing.

Respectfully/submitted,

Anthony J. Ivancovich

Counsel for the California Independent System Operator Corporation