

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

CalPeak Power – El Cajon, LLC) Docket No. ER05-1231-000

**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 (2005), the California Independent System Operator Corporation (“CAISO”) submits this Motion to Intervene. In support thereof, the CAISO states as follows:

I. Description of the Proceeding

On July 21, 2005, CalPeak submitted, pursuant to Section 205 of the Federal Power Act (“FPA”), a limited correction to Schedule D of its rate schedule sheets for its Reliability Must Run Agreement (“RMR Agreement”) with the CAISO. CalPeak requests a January 1, 2005 effective date for the corrected rate schedule.

II. Description of the CAISO and Communications

The CAISO 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 CAISO is the Control Area Operator responsible for the reliable operation of a grid comprising of the transmission systems of a number of public utilities including San Diego Gas & Electric Company (“SDG&E”), as well as the coordination of the ancillary services and real-time electricity markets in California.

The CAISO requests that all communications and notices concerning this motion and these proceedings be provided to:

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III. Motion to Intervene

CalPeak's RMR Unit is located within SDG&E's transmission system and is needed to maintain the reliability of the SDG&E transmission system. As the Control Area Operator responsible for maintaining reliability in the SDG&E transmission system and as the counter party to the RMR Agreement, the CAISO has a unique interest in any Commission proceeding concerning proposed changes to the RMR Agreement. Accordingly, the CAISO has a direct and substantial interest in the proposed changes in this proceeding and requests that it be permitted to intervene with full rights of a party. Because no other party can adequately represent the CAISO's interests in this proceeding, the CAISO's intervention is in the public interest and should be granted.

IV. Conclusion

For the foregoing reasons, the CAISO respectfully requests that the Commission grant the CAISO's motion to intervene in the above-captioned proceeding with full rights of a party.

Respectfully submitted

/s/ Mary Anne Sullivan
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Karin L. Larson
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555 13th Street, N.W.
Washington, D.C. 20004

Counsel for
California Independent System
Operator Corporation

Dated: August 11, 2005

CERTIFICATE OF SERVICE

I hereby certify that I have this 11th day of August, 2005 caused to be served a copy of the forgoing Motion to Intervene upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in these proceedings.

/s/ Sidney M. Davies
Sidney Mannheim Davies
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