

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

**Western Systems Coordinating
Council**)
)

Docket No. ER00-2986-000

**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, and the Commission’s July 3, 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

Kenneth G. Jaffe
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

II. BACKGROUND

On June 29, 2000, the Western Systems Coordinating Council (“WSCC”) tendered for filing with the Commission the First Amendment to the Reliability Criteria Agreement under the WSCC’s Reliability Management System. The purpose of the Amendment is to implement a change in the Disturbance Control Standard (“DCS”), one of the reliability criteria set forth in Annex A to the Reliability Criteria Agreement. Through the Amendment,

the period of time during which the electric system must return to normal levels of operation after a disturbance will be changed from ten to fifteen minutes.¹

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 a party to the original Reliability Criteria Agreement that the Amendment would modify, and has executed a certificate of concurrence with the Amendment for the WSCC to include with its filing. This being the case, the ISO clearly has an interest in this proceeding, and 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.

¹ This change reflects a parallel change on the part of the North American Electric Reliability Council ("NERC"), which also changed its standard for this criterion from ten to fifteen minutes.

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,

Charles Robinson
General Counsel
Roger E. Smith
Senior Regulatory Counsel
The California Independent
System Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630

Kenneth G. Jaffe
David B. Rubin
Julia Moore
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W.
Suite 300
Washington, DC 20007

Attorneys for the California Independent
System Operator Corporation

Date: July 18, 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 18th day of July, 2000.

Julia Moore

July 18, 2000

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

**Re: Western Systems Coordinating Council,
Docket No. ER00-ER00-2986-000**

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,

Julia Moore
Swidler Berlin Shereff Friedman, LLP
3000 K Street, NW, Suite 300
Washington, DC 20007
Tel: (202) 424-7500
Fax: (202) 424-7643

Attorney for the California
Independent System Operator Corporation