

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

Sempra Energy Trading Corp.)
)
) **Docket No. ER00-3473-000**

**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 August 24, 2000, Notice of Filing, the California Independent System Operator Corporation (“ISO”)¹ 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) 351-4400
Fax: (916) 608-7296

Kenneth G. Jaffe
David B. Rubin*
Swidler Berlin Shereff
Friedman, LLP
3000 K Street, NW, Suite 300
Washington, DC 20007
Tel: (202) 424-7500
Fax: (202) 424-7645

* Individuals designated for service pursuant to Rule 203(b)(3),
18 C.F.R. § 385.203(b)(3).

¹ Capitalized terms not otherwise defined herein are defined in the Master Definitions Supplement, ISO Tariff, Appendix A, as filed August 15, 1997, and subsequent revisions.

II. BACKGROUND

On August 23, 2000, Sempra Energy Trading Corp. (“Sempra”) tendered for filing Rate Schedules Nos. 12 and 13 which provide for the sale of energy and ancillary services to San Diego Gas & Electric Company (“SDG&E”), an affiliate of Sempra.

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, SDG&E, and Southern California Edison Company, as well as for the coordination of the competitive electricity market in California. As the operator of this grid, the ISO has a unique interest in any Commission proceeding concerning electricity sales in California. Since the rate schedules proposed by Sempra may affect electricity sales in the ISO Markets, the ISO requests that it be permitted to intervene herein with full rights as a party.

The ISO raises no substantive issues at the present time but reserves the right to do so regarding 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,

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
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W.
Suite 300
Washington, DC 20007

Attorneys for the California Independent
System Operator Corporation

Date: August 31, 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 31st day of August, 2000.

Rebecca A. Blackmer

August 31, 2000

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

**Re: Sempra Energy Trading Corp.
Docket No. ER00-3473-000**

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,

David B. Rubin
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