

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

**Arizona Independent Scheduling        )       Docket No. ER00-3583-000  
Administrator Association            )**

**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 September 7, 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:

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## **II. BACKGROUND**

On September 1, 2000, the Arizona Independent Scheduling Administrator Association ("Arizona ISA") tendered for filing, pursuant to Section 205 of the Federal Power Act, an electric tariff which describes the terms of service pursuant to which retail competition will be implemented throughout much of the State of Arizona. In addition, the Arizona ISA's filing contains certificates of concurrence submitted by Arizona Public Service Company and Tucson Electric Power Company, which are the two transmission providers in the State of Arizona that are FERC-jurisdictional, and that have open access transmission tariffs on file with the Commission. The Arizona ISA requests that the tariff become effective on November 1, 2000.

## **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. As the operator of this grid, the ISO believes that it has a unique interest in any Commission proceeding concerning a transmission system that may affect the operations of the ISO (including a contiguous transmission system, as in this case) and the markets for electricity to be delivered on that system. Accordingly, 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,

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Date: September 22, 2000