

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

Southern California Edison Company) Docket No. ER01-2609-000

**MOTION TO INTERVENE OF THE
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. §§ 385.212 and 385.214, and the Commission’s July 17, 2001 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:

Charles F. Robinson
Margaret A. Rostker
The California Independent System
Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630
Tel: (916) 351-4400
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II. BACKGROUND

On July 17, 2001, Southern California Edison Company ("Edison") tendered for filing an unexecuted copy of the Interconnection Facilities Agreement (Interconnection Agreement") between Edison and Wildflower Energy LP ("Wildflower"). Edison states that Wildflower proposes to operate a 135.9 MW generation facility ("Indigo Project") and to interconnect its generating facility to the ISO Controlled Grid at Edison's Devers-Garnet 115 kV line under the terms and conditions of Edison's Transmission Owner Tariff ("TO Tariff"). Given the forecast generation shortage for Summer 2001, Wildflower has requested Edison to provide interconnection service prior to Edison's completion of a Facilities Study. Edison is willing to provide such service under the condition that, in accordance with the Interconnection Agreement, Wildflower will pay for its proportional share of any System Facilities, costs associated with any required Remedial Action Scheme, and additional equipment required to fully complete the interconnection facility that Edison may identify in the Facilities Study.

The Interconnection Agreement provides terms and conditions for the immediate construction of a new line tap and protection equipment to provide for the physical interconnection of the Indigo Project to the ISO Controlled Grid. System Impact Studies determined that after the year 2003 the Indigo Project may increase the magnitude of thermal overloads under contingency conditions on the Devers-San Bernardino No.1, Devers-Vista No.1, and Devers-Vista No.2 230 kV lines.

Edison and Wildflower have engaged in negotiations but have not yet reached a complete agreement regarding all terms and conditions for the service requested and as would be set forth in the Interconnection Agreement. In order to accommodate Wildflower's requested service initiation data, and at Wildflower's request, Edison has filed and is seeking Commission acceptance of the unexecuted Interconnection Agreement.

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 transmission grid comprising the systems of Pacific Gas and Electric Company, Edison, and San Diego Gas & Electric Company. Inasmuch as Edison and Wildflower propose the Indigo Project be interconnected to the ISO Controlled Grid, the ISO believes that it has a unique interest in any Commission proceeding concerning the agreement submitted. Accordingly, the ISO requests that it be permitted to intervene herein with full rights as a party.

The ISO reserves the right to raise substantive issues 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 the ISO be accorded full party status in this proceeding.

Respectfully submitted,

Charles F. Robinson
Margaret A. Rostker
The California Independent System
Operator Corporation
151 Blue Ravine Road
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Tel: (916) 351-4400
Fax: (916) 608-7296

Counsel for The California Independent
System Operator Corporation

Date: October 11, 2001

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 11th day of October, 2001.

Margaret A. Rostker



October 11, 2001

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

Re: **Southern California Edison Company**
Docket No. ER01-2609-000

Dear Secretary Boergers:

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,

Margaret A. Rostker

Counsel for The California Independent
System Operator Corporation