

II. BACKGROUND

On September 18, 2001, San Diego Gas & Electric Company (“SDG&E”) tendered for filing revisions to its Transmission Owner Tariff (“TO Tariff”). SDG&E states that the proposed revisions include rate changes related to the recovery of costs for the upgrade of its 230 kV transmission line connecting SDG&E’s Imperial Valley Substation to the system of Mexico’s Comision Federal de Electricidad at the international border. SDG&E notes that the rate and revenue impact of this rate will be passed on through the ISO’s transmission Access Charge based on the outcome of proceedings involving Amendment Nos. 27 and 34 of the ISO Tariff.

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, Southern California Edison Company, and SDG&E. As the operator of this grid and the entity that will implement the new transmission Access Charge methodology, 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,

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Date: October 9, 2001

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, this 9th day of October, 2001.

David B. Rubin
202-424-7500

October 9, 2001

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

**Re: San Diego Gas & Electric Company
Docket No. ER01-3074-000**

Dear Secretary Boergers:

Enclosed please find an original and fourteen copies of the Motion to Intervene of the California Independent System Operator Corporation. Also enclosed are two extra copies of the filing to be time/date stamped and returned to us by the messenger. Thank you for your assistance.

Respectfully submitted,

David B. Rubin

Counsel for the California
Independent System Operator Corporation