

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

San Diego Gas and Electric Company) Docket No. ER01-3127-000

**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 September 27, 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 September 27, 2001, San Diego Gas & Electric Company ("SDG&E") tendered for filing copies of its Service Agreements Nos. 11 and 12 to SDG&E's FERC Electric Tariff, First Revised Vol. No. 6. These agreements relate to the interconnection to SDG&E transmission system of a new generation plant to be owned by CalPeak Power-Border, LLC ("CalPeak Border"). Service Agreement No. 11 is the Expedited Interconnection Facilities Agreement dated September 24, 2001 between SDG&E and CalPeak Border under which SDG&E will construct, operate and maintain the proposed interconnection facilities. Service Agreement No. 12, the Interconnection Agreement between SDG&E and CalPeak Border dated September 24, 2001, establishes interconnection and operating responsibilities and associated communications procedures between the parties.

To begin operation of its generating plant on September 30, 2001, CalPeak Border has advised SDG&E that it will need the interconnection facilities to be in service by September 24, 2001. For that reason, SDG&E submitted the agreements in unexecuted form, noting however, that the parties have agreed upon the agreements and that SDG&E anticipates that the agreements will be executed in California on or about September 24, 2001. SDG&E requests the Commission to grant waivers as are necessary to make the agreements effective on September 24, 2001.

The agreement, among other terms and conditions, provide for the physical interconnection of the CalPeak Border project to the SDG&E Electric System which in turn is connected with the ISO Controlled Grid.

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. Inasmuch as SDG&E proposes the CalPeak Border project be interconnected to the SDG&E Electric System which in turn interconnects and affects 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
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Tel: (916) 351-4400
Fax: (916) 608-7296

Counsel for The California Independent
System Operator Corporation

Date: October 12, 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 12th day of October, 2001.

Margaret A. Rostker



October 12, 2001

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

**Re: San Diego Gas and Electric Company
Docket No. ER01-3127-000**

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