



## II. BASIS FOR MOTION TO INTERVENE

On November 1, 2000, Southern California Edison Company (“ Edison”) tendered for filing with the Commission amendments to its Transmission Owner Tariff (“TO Tariff”). Therein, Edison seeks to establish a new rate schedule setting forth rates and a ratemaking mechanism for the recovery of Reliability Service costs<sup>2</sup> from all customers with Load located in Edison’s Service Area taking transmission service under the ISO Tariff and Edison’s TO. These new rates would recover costs associated with both Reliability Must-Run (“RMR”) contracts and out-of-market (“OOM”) dispatch orders to generators that are paid by the Participating TO, as well as any new costs levied by the ISO in connection with services that meet Edison’s definition of a Reliability Service that are paid by Participating TOs. The rate schedule proposed by Edison includes a balancing account mechanism that Edison maintains will ensure that it neither under-collects nor over-recovers from customers the costs of Reliability Services assessed by the ISO to Participating TOs. Edison proposes that these amendments be made effective for service rendered on and after the later of January 1, 2001, or the effective date of new retail rates authorized by the California Public Utilities Commission that modify the frozen retail rates established pursuant to California Assembly Bill 1890.

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 California’s investor-owned utilities – Pacific Gas & Electric Company, San Diego Gas & Electric Company (“SDG&E”), and Edison – as well as for

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<sup>2</sup> In its TO Tariff, Edison defines Reliability Services as “[t]hose services provided by the ISO: 1) that are deemed necessary by the ISO to maintain reliable electric service in the ISO Control Area; and (2) whose costs are billed by the ISO to the Participating TO pursuant to the ISO Tariff.”

the coordination of the competitive electricity market in California. The costs that Edison proposes to include in its Reliability Services Charges are costs assessed under the ISO Tariff, and are necessary to the ISO's fulfillment of its responsibilities for maintaining reliability. The ISO therefore has an interest in proceedings, such as the instant proceeding, that may affect Edison's ability to recover those costs. This interest cannot adequately be represented by any other party. The ISO is responsible for ensuring nondiscriminatory access to the ISO Controlled Grid, which may be affected by the allocation of the costs of ensuring reliability among the users of the ISO Controlled Grid. The ISO's participation in this proceeding is therefore in the public interest.

### **III. 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. While the ISO has no substantive issues that it wishes to raise at the present time, it reserves the right to file supplemental comments if warranted

Respectfully submitted,

Charles Robinson, General Counsel  
Roger E. Smith, Sr. Regulatory Counsel  
Beth Ann Burns, Regulatory Counsel  
California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630

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Edward Berlin  
Kenneth G. Jaffe  
Michael E. Ward  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, NW, Suite 300  
Washington, DC 20007  
Tel: (202) 424-7500  
Fax: (202) 424-7643  
Counsel for the California Independent  
System Operator Corporation

Date: November 27, 2000

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing documents upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, DC, on this 27<sup>th</sup> day of November, 2000.

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Michael E. Ward

November 27, 2000

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

Re: **Southern California Edison Company,  
Docket No. ER01-315-000**

Dear Secretary Boergers:

Enclosed for filing are one original and 14 copies of the Motion to Intervene and Protest the California Independent System Operator Corporation in the above-identified 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.

Yours truly,

Michael E. Ward  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, NW, Suite 300  
Washington, DC 20007  
Tel: (202) 424-7500  
Fax: (202) 424-7643

Counsel for the California  
Independent System Operator Corporation