

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

Southern Energy Delta, L.L.C.) Docket No. ER01-362-000
Southern Energy Potrero, L.L.C.)

**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 November 3, 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 November 3, 2000, Southern Energy Delta, L.L.C. ("SE Delta"), and Southern Energy Potrero, L.L.C. ("SE Potrero") (collectively, "Southern Energy"), tendered for filing revised tariff sheets to their respective Must-Run Service Agreements ("RMR Agreements") between Southern Energy and the ISO. These agreements pertain to the generation facilities owned by SE Delta (Contra Costa and Pittsburg Power Plants) and SE Potrero (Potrero Power Plant) that provide RMR service to the ISO. The purpose of Southern Energy's filing is to: (1) revise Schedules A and B of the RMR Agreements to specify changes to the Contract Service Limits, Hourly Availability Charges and Penalty Rates, and projected outage information for the for the year beginning January 1, 2001; and (2) correct certain typographical errors in Schedules A and F of the RMR Agreements.

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 Must-Run service provided to the ISO.

The revisions proposed by Southern Energy for the year 2001 are based on the Offer of Settlement filed by Southern Energy on September 28, 2000,

which is currently pending before the Commission.¹ Neither the ISO, nor any other party opposes the Offer of Settlement. Accordingly, the ISO does not oppose Southern Energy's current filing on the assumption the Commission approves the Offer of Settlement. The ISO, however, reserves the right to file supplemental comments if the Commission does not approve the Offer of Settlement as filed.

IV. CONCLUSION

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: November 22, 2000

¹ *Southern Energy Delta, L.L.C. and Southern Energy Potrero, L.L.C.*, Docket Nos. ER00-936 *et al.* (September 28, 2000).