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FEDERAL ENERGY
REGULATORY COMMISSION

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January 19, 2001

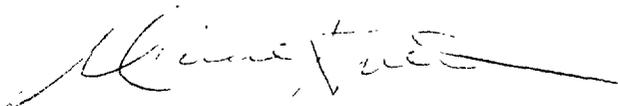
David P. Boergers, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Re: San Diego Gas & Electric Company
Docket No. ER01-844-000**

Dear Secretary Boergers:

Enclosed for filing in the above-captioned proceeding are an original and fourteen copies of the Motion to Intervene of the California Independent System Operator Corporation. Two additional copies of the filing are also enclosed. I would appreciate your stamping the additional copies with the date filed and returning it to the messenger.

Respectfully submitted,



Michael Kunselman
Counsel for the California Independent System

Operator Corporation

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

**San Diego Gas & Electric Company) Docket No. ER01-844-000
)**

**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 January 5, 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:

Roger E. Smith, Senior
Regulatory Counsel
Deborah Le Vine, Director of
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The California Independent System
Operator Corporation
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II. BACKGROUND

On December 26, 2000, San Diego Gas & Electric Company ("SDG&E") tendered for filing a change in the rate for the Transmission Revenue Balancing Account Adjustment ("TRBAA") rate as set forth in its Transmission Owner Tariff ("TO Tariff"). SDG&E states that the effect of this rate change will be to reduce rates for jurisdictional transmission service utilizing the portion of the ISO ControlledGrid owned by SDG&E. SDG&E requests that the new rate become effective as of January 1, 2001.

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, SDG&E, and Southern California Edison Company, as well as for the coordination of the competitive electricity market in California. The costs included in SDG&E's TRBAA rate are intended to recover costs assessed to SDG&E by the ISO. Therefore, the ISO has a unique interest in any Commission proceeding concerning the TRBAA rate charged by a Participating Transmission Owner ("Participating TO"). This interest cannot adequately be represented by any other party. Moreover, the ISO is responsible for ensuring nondiscriminatory access to this grid, which may be affected by the TRBAA rate charged by a Participating TO. The ISO's participation in this proceeding is therefore in the public interest.

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,

A handwritten signature in black ink, appearing to read "Edward Berlin", is written over a horizontal line.

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Counsel for the California Independent
System Operator Corporation

Date: January 19, 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, on this 19th day of January, 2001.



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