

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

**San Diego Gas & Electric  
Company**

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**Docket No. ER04-1048-000**

**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 August 2, 2004, 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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Senior Regulatory Counsel  
Deborah A. LeVine, Director of  
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## **II. BACKGROUND**

On July 28, 2004, San Diego Gas & Electric Company (SDG&E) tendered for filing Service Agreement No. 19 under SDG&E, FERC Electric Tariff, First Revised Volume No. 6. San Diego states that the agreement provides for SDG&E to construct, operate, and maintain proposed interconnection facilities required for a pumped storage hydro-electric facility being constructed and owned by the San Diego County Water Authority in San Diego County. SDG&E requests an effective date of July 28, 2004.

By its Notice issued August 2, 2004, the Commission established August 18, 2004, as the date motions to intervene are to be filed in the above-captioned proceeding.

## **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 & Electric Company, Southern California Edison Company, San Diego Gas & Electric Company and the Cities of Vernon, Anaheim, Azusa, Banning and Riverside, California. As the

operator of this grid, the ISO believes that it has a unique interest in any Commission proceeding concerning the issues raised in the captioned proceeding.

#### **IV. CONCLUSION**

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,

**/s Anthony J. Ivancovich**

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Counsel for the California Independent  
System Operator Corporation

Date: August 18, 2004

## 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 18th day of August 2004.

**/s Anthony J. Ivancovich**  
Anthony J. Ivancovich



August 18, 2004

The Honorable Magalie Roman Salas  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

Re: **San Diego Gas & Electric Company**  
**Docket No. ER04-1048-000**

Dear Secretary Salas:

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,

**/s Anthony J. Ivancovich**  
Anthony J. Ivancovich  
Counsel for the California Independent  
System Operator Corporation