



October 25, 2004

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

Re: **Trans-Elect NTD Path 15, LLC**  
**Docket No. ER05-17-000**

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



**II. BACKGROUND**

On October 4, 2004, Trans-Elect NTD Path 15 LLC (NTD Path 15) submits for filing the materials necessary under FPA section 205 to establish its transmission revenue requirement. In addition, NTD Path 15 submits its FERC TO Tariff as a participating transmission owner in the CAISO. NTD Path 15 requests an effective date of December 4, 2004.

By its Notice issued October 8, 2004, the Commission established October 25, 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.

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#### **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  
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Date: October 25, 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 25th day of October 2004.

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