



November 3, 2004

**VIA ELECTRONIC FILING**

The Honorable Magalie R. Salas  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

**Re: Williams Power Company, Inc.  
Docket No. ER05-44-000**

Dear Secretary Salas:

Transmitted herewith for electronic filing in the above-referenced proceeding is the Motion to Intervene of the California Independent System Operator Corporation.

Thank you for your assistance in this matter.

Yours truly,

**/s/ Sidney L. Mannheim**

Sidney L. Mannheim  
Regulatory Counsel

Counsel for the California Independent  
System Operator Corporation

Enclosure

cc: Service List

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

**Williams Power Company, Inc.                    )           Docket No. ER05-44-000**

**MOTION TO INTERVENE OF THE  
CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Pursuant to Rules 211 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. §§ 385.214 and § 385.211 and the Commission’s October 19, 2004 Notice of Filing, the California Independent System Operator Corporation (“ISO”) submits this Motion to Intervene in the above captioned proceeding. In support thereof, the ISO states as follows:

**I. DESCRIPTION OF THE PROCEEDING**

On October 13, 2004, Williams Power Company, Inc. (“Williams”) filed, pursuant to Section 205 of the Federal Power Act (“FPA”), revisions to the Reliability Must-Run Rate Schedule of its Reliability Must Run Agreement (“RMR Agreement”) with the ISO pertaining to the Alamos and Huntington Beach RMR Units. The stated purpose of Williams’ filing is to revise the Ramp Rate values set forth in Schedule A of the RMR Agreement in response to ISO Amendment No. 54 (ER03-1046-000). Pursuant to Amendment 54 as part of Phase 1B of the ISO’s Market Redesign and Technology Upgrade (MRTU), the ISO is required, among other things, to set the ISO Master File ramp rates for resources subject to RMR Agreements equal to the Ramp Rate values set forth in Schedule A of

the RMR Agreements. Prior to changing the ISO Master File values to conform with the values set forth in Schedule A of the RMR Agreement, the ISO provided all RMR owners with the opportunity to modify Schedule A of their RMR Agreements to reflect the ramp rates in the ISO's Master File. For those RMR owners electing to adopt the values in the ISO Master File as the values for Schedule A of their RMR Agreements, the ISO would not be required to change the values in the ISO Master File.

In its filing, Williams elected to modify Schedule A of its RMR Agreement to match the ramp rate values in the ISO's Master and requested an effective date of October 14, 2004. The ISO has reviewed Williams' filing and agrees that the proposed amendments to Schedule A match the ramp rate values in the ISO's Master File. Accordingly, the ISO supports Williams' filing and its request for an effective date of October 14, 2004.

## **II. DESCRIPTION OF THE ISO AND COMMUNICATIONS**

The ISO is a non-profit public benefit corporation organized under the laws of the State of California with a principal place of business at 151 Blue Ravine Road, Folsom, CA 95630. The ISO is the Control Area Operator responsible for the reliable operation of the electric grid comprising the transmission systems of a number of public utilities including Southern California Edison Company ("SCE"), as well as the coordination of the competitive ancillary services and real-time electricity markets in California.

The ISO requests that all communications and notices concerning this motion and these proceedings be provided to:

Sidney L. Mannheim  
Regulatory Counsel  
California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
916-608-7144 (tel)  
916-608-7222 (fax)

Deborah A. LeVine  
Director of Contracts  
California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
916-351-2144 (tel)  
916-608-7222 (fax)

### **III. ISO'S INTEREST**

Williams' RMR Units are located within SCE's transmission system and are needed to maintain the reliability of the SCE's transmission system. As the Control Area Operator responsible for maintaining reliability in the SCE transmission system and as the counter party to the RMR Agreement, the ISO has a unique interest in any Commission proceeding that affects an RMR Agreement. Accordingly, the ISO has a direct and substantial interest in the proposed changes in this proceeding and requests that it be permitted to intervene with full rights of a party. Because no other party can adequately represent the ISO's interests in this proceeding, the ISO's intervention is in the public interest and should be granted.

#### **IV. CONCLUSION**

For the foregoing reasons, the ISO respectfully requests that the Commission grant this Motion to Intervene and make the ISO a party in the above-caption proceeding with full rights of participation and requests that the Commission accept Williams' filing and approve the requested effective date of October 14, 2004.

Respectfully submitted

**Sidney L. Mannheim**  
Sidney L. Mannheim  
California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630

Dated: November 3, 2004

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 3<sup>rd</sup> day of November, 2004 caused to be served a copy of the forgoing Motion to Intervene and Protest upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

**/s/ Karen Voong** \_\_\_\_\_

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