



November 30, 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. ES05-11-000

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

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***Individual designated for service pursuant to Rule 203 (b)(3), 18 C.F.R. § 203(b)(3)**

II. BACKGROUND

On October 29, 2004, Trans-Elect NTD Path 15, LLC (NTD Path 15) requested authority to issue up to \$40 million in additional equity to NTD Holding Path 15. NTD Path 15 also requests a waiver from the Commission's competitive bidding and negotiated requirements at 18 CFR 34.2.

By its Notice issued November 9, 2004, the Commission established November 30, 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 PG&E, 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,

¹ In addition to Mr. Ivancovich and Mr. Rubin, the ISO respectfully requests that Ms. Le Vine be included in the Official Service List. Mr. Ivancovich and Ms. Le Vine work in separate buildings, and it would be of significant assistance to the ISO if both were included on the list.

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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Date: November 30, 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 30th day of November 2004.

/s/ Anthony J. Ivancovich
Anthony J. Ivancovich