

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

<b>San Diego Gas &amp; Electric Company,</b>	)		
<b>Complainant,</b>	)		
	)		
<b>v.</b>	)	<b>Docket Nos.</b>	<b>EL00-95-081</b>
	)		<b>EL00-95-074</b>
<b>Sellers of Energy and Ancillary Services</b>	)		<b>EL00-95-086</b>
<b>Into Markets Operated by the California</b>	)		
<b>Independent System Operator and the</b>	)		
<b>California Power Exchange,</b>	)		
<b>Respondents.</b>	)		
	)		
<b>Investigation of Practices of the California</b>	)	<b>Docket Nos.</b>	<b>EL00-98-069</b>
<b>Independent System Operator and the</b>	)		<b>EL00-98-062</b>
<b>California Power Exchange</b>	)		<b>EL00-98-073</b>

**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 February 18, 2005, Notice of Filing, the California Independent System Operator Corporation (“ISO”) hereby moves to intervene in the above captioned proceeding.<sup>1</sup> In support thereof the ISO states as follows:

**I. COMMUNICATIONS**

Please address communications concerning this filing to the following persons:

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<sup>1</sup> Capitalized terms not otherwise defined herein are defined in the Master Definitions Supplement, Appendix A to the ISO Tariff, as filed August 15, 1997, and subsequently revised.

J. Philip Jordan  
Michael Kunselman

Swidler Berlin, LLP  
3000 K Street, Ste. 300  
Washington, D.C. 20007  
Telephone: (202) 424-7500

Counsel for the California Independent  
System Operator Corporation

Charles F. Robinson  
General Counsel  
Gene L. Waas  
Regulatory Counsel

The California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
Telephone: (916) 608-7049

## **II. BACKGROUND**

On February 11, 2005, the City of Pasadena (“Pasadena”) tendered for filing certain emissions cost calculations in the form of a compliance filing the results of which are to be included in the financial reruns of the ISO’s settlements and billing system that have been ordered by the Commission in this proceeding. Pasadena’s filing was required by the Commission’s order of November 23, 2004 “Order on Rehearing”, 109 FERC ¶ 61,218. Pasadena requested that the ISO apply \$593,536 as an emissions offset to any refunds that Pasadena is calculated to owe in the financial adjustment phase of the refund proceeding that will soon be conducted.

By its Notice issued February 18, 2005, the Commission established March 4, 2005, as the date that 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 operation of a grid comprising

the transmission systems of Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Trans-Elect NTD Path 15 LLC, Western Area Power Administration- Sierra Nevada Region and the Cities of Vernon, Anaheim, Azusa, Banning, Riverside and Pasadena, California. As the operator of this grid and the entity that must perform the calculations that will be a part of the final compliance filing in the refund proceeding, the ISO believes that it has a unique interest in any Commission proceeding concerning the issues raised in the above-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/ Gene L. Waas**  
Gene L. Waas  
Regulatory Counsel

The California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
Tel: (916) 608-7049  
Fax: (916) 608-7296

Counsel for the California Independent  
System Operator

Date: March 4, 2005



March 4, 2005

**BY ELECTRONIC TRANSMISSION**

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

**Re: *San Diego Gas & Electric Company v. Sellers of Energy and Ancillary Services into Markets Operated by the California Independent System Operator Corporation and California Power Exchange***  
**Docket No. EL00-95, et al.**

Dear Secretary Salas:

Enclosed for electronic filing please find an Intervention of the California Independent System Operator Corporation in the above-referenced dockets.

Thank you for your assistance in this matter.

Very truly yours,

**/s/ Gene L. Waas**

Gene L. Waas

Counsel for the California Independent  
System Operator Corporation

Enclosures

cc: All parties of record

## **CERTIFICATE OF SERVICE**

I hereby certify that I have on this day served copies of the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Folsom, CA, this 4<sup>th</sup> day of March, 2005.

**/s/ Gene L. Waas**  
Gene L. Waas