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13 JUL 16 PM 12:41

FEDERAL ENERGY
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July 16, 2003

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

**Re: *American Electric Power Service Corporation et al.*, Docket
Nos. EL03-137 et al.
California Independent System Operator Corporation's Motion
to Intervene**

Dear Secretary Salas:

Enclosed for filing are one original and fourteen copies of the Motion to Intervene of the California Independent System Operator Corporation submitted in the above-captioned proceeding. Also enclosed are two extra copies of the motion to be time/date stamped and returned to us by the messenger. Thank you for your assistance. Please contact the undersigned if you have any questions regarding this filing.

Respectfully submitted,



Michael Kunselman

Counsel for the California
Independent System Operator
Corporation

Enclosures

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

American Electric Power Service Corporation)	Docket No. EL03-137-000
Aquila, Inc.)	Docket No. EL03-138-000
Arizona Public Service Company)	Docket No. EL03-139-000
Automated Power Exchange, Inc.)	Docket No. EL03-140-000
Bonneville Power Administration)	Docket No. EL03-141-000
California Department of Water Resources)	Docket No. EL03-142-000
California Power Exchange)	Docket No. EL03-143-000
Cargill-Alliant, LLC)	Docket No. EL03-144-000
City of Anaheim, California)	Docket No. EL03-145-000
City of Azusa, California)	Docket No. EL03-146-000
City of Glendale, California)	Docket No. EL03-147-000
City of Pasadena, California)	Docket No. EL03-148-000
City of Redding, California)	Docket No. EL03-149-000
City of Riverside, California)	Docket No. EL03-150-000
Coral Power, LLC)	Docket No. EL03-151-000
Duke Energy Trading and Marketing Company)	Docket No. EL03-152-000
Dynegy Power Marketing, Inc.,)	Docket No. EL03-153-000
Dynegy Power Corp., El Segundo Power LLC,))	
Long Beach Generation LLC, Cabrillo)	
Power I LLC, and Cabrillo Power II LLC)	
Enron Power Marketing, Inc.)	Docket No. EL03-154-000
and Enron Energy Services, Inc.)	
F P & L Energy)	Docket No. EL03-155-000
Idaho Power Company)	Docket No. EL03-156-000
Los Angeles Department of Water and Power)	Docket No. EL03-157-000
Mirant Americas Energy Marketing, LP, Mirant)	Docket No. EL03-158-000
California, LLC, Mirant Delta, LLC, and)	
Mirant Potrero, LLC)	
Modesto Irrigation District)	Docket No. EL03-159-000
Morgan Stanley Capital Group)	Docket No. EL03-160-000
Northern California Power Agency)	Docket No. EL03-161-000
Pacific Gas and Electric Company)	Docket No. EL03-162-000
PacifiCorp)	Docket No. EL03-163-000
PGE Energy Services)	Docket No. EL03-164-000
Portland General Electric Company)	Docket No. EL03-165-000
Powerex Corporation)	Docket No. EL03-166-000
(f/k/a British Columbia Power Exchange Corp.))	
Public Service Company of Colorado)	Docket No. EL03-167-000
Public Service Company of New Mexico)	Docket No. EL03-168-000
Puget Sound Energy, Inc.)	Docket No. EL03-169-000
Reliant Resources, Inc.,)	Docket No. EL03-170-000

Reliant Energy Power Generation, and)	
Reliant Energy Services, Inc.)	
Salt River Project Agricultural)	Docket No. EL03-171-000
Improvement and Power District)	
San Diego Gas & Electric Company)	Docket No. EL03-172-000
Sempra Energy Trading Corporation)	Docket No. EL03-173-000
Sierra Pacific Power Company)	Docket No. EL03-174-000
Southern California Edison Company)	Docket No. EL03-175-000
TransAlta Energy Marketing (U.S.) Inc.)	Docket No. EL03-176-000
and TransAlta Energy Marketing)	
(California), Inc.)	
Tucson Electric Power Company)	Docket No. EL03-177-000
Western Area Power Administration)	Docket No. EL03-178-000
Williams Energy Services Corporation)	Docket No. EL03-179-000

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

Pursuant to Rule 214 (18 CFR 385.214) of the Federal Energy Regulatory Commission's ("the Commission") Rules of Practice and Procedure, and the Commission's June 25, 2003 "Order to Show Cause Concerning Gaming and/or Anomalous Market Behavior," 103 FERC ¶ 61,345 (2003) ("Show Cause Order"), the California Independent System Operator Corporation ("ISO"), by and through its undersigned counsel, hereby moves to intervene in this proceeding. In support therefor, the ISO states as follows:

I. COMMUNICATIONS

Please address communications concerning this filing to the following persons:

Charles F. Robinson

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Gene Waas

Regulatory Counsel

Beth Ann Burns

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II. BACKGROUND

In the Show Cause Order, the Commission required over 40 entities to show cause, in an evidentiary hearing to be held before an administrative law judge ("ALJ"), why they should not be found to have engaged in activities that constitute gaming and/or anomalous market behavior in violation of the ISO and California Power Exchange Tariffs during the period from January 1, 2000 to June 20, 2001. The Commission based its conclusion that these entities appear to have engaged in these types of behavior on the provisions of the ISO Tariff, several studies prepared by the ISO concerning trading and scheduling practices in the ISO Markets, a Commission Staff report, and evidence submitted by market participants. The Commission also directed the ALJ to "hear evidence and render findings and conclusions quantifying the full extent to which the

Identified Entities may have been unjustly enriched as a result of their conduct” and also noted that the ALJ “may recommend the monetary remedy of disgorgement of unjust profits and any other additional, appropriate non-monetary remedies.” Show Cause Order at P 2.

Additionally, the Commission ordered the ISO, within 21 days of the date of the Show Cause Order, to provide the entities named in the order with all of the transaction data for each practice described in the ISO’s studies that was found by the Commission to constitute a violation of the ISO Tariff, as well as an explanation of the screens that it used to identify the transactions in question. The ISO was also directed to file this data with the Commission.

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 and Electric Company, San Diego Gas & Electric Company, the City of Vernon, California, and Southern California Edison, as well as for the coordination and monitoring of the competitive electricity market in California.

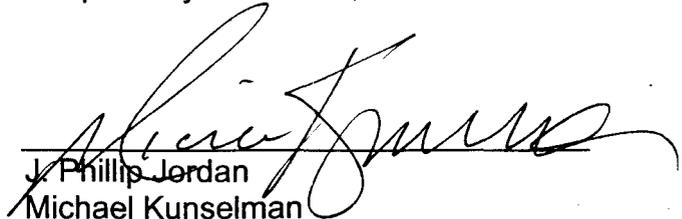
As the grid operator and market monitor, the ISO has a direct and substantial interest in this proceeding that cannot be adequately represented by other parties. Moreover, it is the ISO’s Tariff that the Commission has found may have been violated by the activities and behavior described in the Show Cause Order, and this finding was largely based on studies performed by the

ISO. For these reasons, the participation of the ISO is in the public interest and should be granted.

IV. CONCLUSION

For the foregoing reasons, the ISO respectfully requests that the Commission permit it to intervene, and that it be accorded full party status in this proceeding.

Respectfully Submitted,



A handwritten signature in black ink, appearing to read "Michael Kunselman", is written over a horizontal line.

J. Phillip Jordan

Michael Kunselman

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CERTIFICATE OF SERVICE

I hereby certify that I have caused the foregoing document to be served by first class mail, postage prepaid, upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 16th day of July, 2003.



Michael Kunselmen