



September 21, 2005

VIA ELECTRONIC FILING

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

**Re: San Diego Gas & Electric Company
Docket No. ER05-1414-000**

Dear Secretary Salas:

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

Thank you for your attention to this matter.

Yours truly,

/s/ Sidney Mannheim Davies

Sidney Mannheim Davies
Associate General Counsel

Counsel for the California Independent
System Operator Corporation

Enclosure

cc: Service List

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

San Diego Gas & Electric)
Company) **Docket No. ER05-1414-000**
)

**MOTION TO INTERVENE AND COMMENT 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 September 7, 2005, Notice of Filing, the California Independent System Operator Corporation (“CAISO”) submits this Motion to Intervene and comment in the above captioned proceeding. In support thereof, the CAISO states as follows:

I. DESCRIPTION OF THE PROCEEDING

On August 31, 2005, San Diego Gas & Electric Company (SDG&E) tendered for filing its First Revised Sheet 129, 131, 132 and 148 of its Rate Schedule FERC No. 12 Reliability Must-Run Service Agreement between SDG&E and the California CAISO (RMR Agreement.) On September 19, 2005, SDG&E, tendered for filing an errata to its August 31, 2005 filing, consisting of Substitute First Revised Sheets Nos. 129, 131, 132 and 148 superseding the Original sheets to the RMR Agreement Schedules A and C. In addition, in its September 19, 2005 errata filing, SDG&E requested an October 1, 2005 effective date.

II. DESCRIPTION OF THE ISO AND COMMUNICATIONS

The CAISO is a non-profit public benefit corporation organized under the laws of the State of California with its principal place of business at 151 Blue Ravine Road, Folsom, CA 95630. The CAISO is the Control Area operator responsible for the reliable operation of the electric grid comprising the transmission systems of a number of utilities including San Diego Gas & Electric Company (“SDG&E”), as well as the coordination of the ancillary services and real-time electricity markets in California.

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

Sidney Mannheim Davies
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California Independent System
Operator Corporation
151 Blue Ravine Road
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III. CAISO’S INTEREST

SDG&E’s transmission system is needed to maintain the reliability of the ISO Controlled Grid. As the Control Area operator and as the counter party to the RMR Agreement, the CAISO has a unique interest in any Commission proceeding that affects an RMR Agreement. Accordingly, the CAISO has a direct and substantial interest in this proceeding and requests that it be permitted to intervene. Because no other party can adequately represent the CAISO’s

interests in this proceeding, the CAISO's intervention is in the public interest and should be granted.

IV. COMMENT

The main purpose of SDG&E's errata was to change the proposed effective date of the changes to the rate schedules submitted in its August 31, 2005 filing from August 31, 2005, to October 1, 2005 in response to the CAISO notifying SDG&E that it would be impossible for the CAISO to effectuate an August 31, 2005 effective date. (SDG&E also corrected a typographical error in Table C1-7a.) The CAISO can accommodate the October 1, 2005 proposed effective date. Accordingly, the CAISO urges the Commission to accept SDG&E's Substitute First Revised Sheets that were tendered for filing on September 19, 2005.

V. CONCLUSION

For the foregoing reasons, the CAISO respectfully requests that the Commission grant this Motion to Intervene and make the CAISO a party in the above-caption proceeding with full rights of participation.

Dated: September 21, 2005

Respectfully submitted

/s/ Sidney Mannheim Davies
Sidney Mannheim Davies
The California Independent
System Operator Corporation
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CERTIFICATE OF SERVICE

I hereby certify that I have this 21st day of September 2005 caused to be served a copy of the forgoing document upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

/s/ Sidney Mannheim Davies
Sidney Mannheim Davies