



September 6, 2005

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

**Re: San Diego Gas and Electric Company
Docket No. ER05-1337-000**

Dear Secretary Salas:

Enclosed please find an electronic filing of the Motion to Intervene and comments 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

Anthony J. Ivancovich*
Assistant General Counsel
Deborah A. Le Vine²
Director of Market Services
California Independent System
Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630
Tel: (916) 608-7135
Fax: (916) 608-7296
aivancovich@caiso.com
dlevine@caiso.com

Michael Ward*
Alston & Bird, LLP
601 Pennsylvania Ave, N.W.
North Building, Tenth Floor
Washington D.C. 20004-2601
Tel: (202) 756-3076
Fax: (202) 756-3333
michael.ward@alston.com

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

II. BACKGROUND

On August 15, 2005, San Diego Gas & Electric Company (SDG&E) submitted its annual transmission formula rate change filing.

By its Notice issued August 19, 2005, the Commission established September 6, 2005, 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 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, the ISO believes that it

² In addition to Mr. Ivancovich and Mr. Ward, 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.

has a unique interest in any Commission proceeding concerning the issues raised in the captioned proceeding.

IV. COMMENTS

One component of the Transmission Revenue Requirement filed by SDG&E is Standby Revenue. While SDG&E did include this component, they neglected to prove the split between high voltage and low voltage, which is critical for the ISO's implementation of the new rate. The ISO requests that the Commission require SDG&E to make the split in their component so that the ISO can correctly implement the revised rate.

V. 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

Anthony J. Ivancovich
Assistant General Counsel
California Independent System
Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630
Tel: (916) 608-7135
Fax: (916) 608-7296

Counsel for the California Independent
System Operator Corporation

Date: September 6, 2005

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 6th day of September, 2005.

/s/ Anthony J. Ivancovich
Anthony J. Ivancovich