

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

**San Diego Gas & Electric Company) Docket No. ER01-831-000
)**

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

Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. §§ 385.212 and 385.214, and the Commission’s January 5, 2001 Notice of Filing, the California Independent System Operator Corporation (“ISO”) hereby moves to intervene in the above-captioned proceeding. In support thereof, the ISO states as follows:

I. COMMUNICATIONS

Please address communications concerning this filing to the following persons:

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II. BACKGROUND

On December 29, 2000, San Diego Gas & Electric Company (“SDG&E”) tendered for filing revisions to its Transmission Owner Tariff (“TO Tariff”). SDG&E stated that the proposed revisions include rate changes required to implement the implementation by the ISO of the new transmission Access Charge (“TAC”) methodology. SDG&E requested that the Commission authorize that the proposed TO Tariff changes be made effective for service rendered on and after January 1, 2001, provided that the City of Vernon, California became a Participating Transmission Owner as of January 1, 2001.

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, and SDG&E, as well as for the coordination of the competitive electricity market in California. As the operator of this grid and the entity that will implement the new TAC methodology, the ISO believes that it has a unique interest in any Commission proceeding concerning the agreement submitted. Accordingly, the ISO requests that it be permitted to intervene herein with full rights as a party.

The ISO reserves the right to raise substantive issues regarding any further aspects of the proceeding ordered by the Commission. The ISO also reserves the right to file supplemental comments if warranted.

IV. COMMENTS

SDG&E is incorrect in asserting that the applicable charges shall be paid by the Participating TOs to the ISO pursuant to the ISO Tariff.¹ Under the ISO Tariff, it is the Original Participating TOs that pay the Transition Charge, and the Utility Distribution Companies, Metered Subsystems, and Scheduling Coordinators that pay the Access Charge.²

¹ See SDG&E TO Tariff Filing, Original Sheet No. 4, § 1.1.

² See Amendment No. 27 Filing, Docket No. ER00-2019-000 (Mar. 31, 2000). The Commission has accepted Amendment No. 27 for filing, suspended for a nominal period, subject to refund, and set it for hearing. The hearing is held in abeyance pending efforts at settlement. *California Independent System Operator Corporation*, 91 FERC ¶ 61,205 (2000).

V. CONCLUSION

Wherefore, for the foregoing reasons, the ISO respectfully requests that the Commission permit it to intervene, that the Commission take the comments presented above into account in rendering an order concerning SDG&E's filing, and that the ISO be accorded full party status in this proceeding.

Respectfully submitted,

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Date: January 19, 2001