



July 16, 2004

BY ELECTRONIC TRANSMISSION

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

Re: Reliant Energy Etiwanda, Inc., Docket No. ER04-959-000

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.

Very truly yours,

/s/ Sidney L. Mannheim

Sidney L. Mannheim

Counsel for the California Independent
System Operator Corporation

Enclosures

cc: All parties of record

pursuant to 18 C.F.R. § 35.11 to permit an effective date for the RMR Agreement of July 1, 2004.

II. DESCRIPTION OF THE CAISO AND COMMUNICATIONS

The CAISO is a non-profit public benefit corporation organized under the laws of the State of California with a 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 a grid comprising the transmission systems of a number of public utilities including Southern California Edison Corporation (SCE), as well as for the coordination of the competitive ancillary services and real-time electricity markets in California.

Please address communications concerning this filing to the following persons:²

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² Pursuant to Rule 101(e), 18 C.F.R. § 385.101(3), the ISO requests waiver of the Commission's limit on persons to be served, as set forth in 18 C.F.R. § 385.203(b)(3).

III. BASIS FOR MOTION TO INTERVENE

Etiwanda's RMR facility is located within, and is needed to maintain the reliability of, SCE's transmission system. As the Control Area Operator responsible for maintaining reliability in the SCE transmission system and as the counter party to the RMR Agreement, the CAISO has a unique interest in any Commission proceeding concerning the terms and conditions of an RMR Agreement. Accordingly, the CAISO has a direct and substantial interest in the proposed RMR Agreement in this proceeding and requests that it be permitted to intervene with full rights of a party. 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. COMMENTS

As noted above, the RMR Agreement and Letter Agreement filed by Etiwanda have been executed by both Etiwanda and the CAISO, reflecting the CAISO's support of, and agreement with, the terms and conditions set forth in those agreements. The Units subject to the RMR Agreement are urgently needed for the remainder the 2004 contract year. SCE, the Responsible Utility under the RMR Agreement, also recognizes the urgent reliability need for these Units. As set forth in Etiwanda's June 25, 2004 transmittal letter, interested state parties, the California Public Utilities Commission and the California Electricity Oversight Board, do not oppose the filing and will not protest the filing.

V. CONCLUSION

For the foregoing reasons, the CAISO respectfully requests that the Commission grant this motion to intervene and accept Etiwanda's June 25, 2004 submission effective as of July 1, 2004.

July 16, 2004

Respectfully submitted,

/s/ Sidney L. Mannheim

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CERTIFICATE OF SERVICE

I hereby certify that I have on this 16th day of July 2004, served copies of the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

/s/ Sidney L. Mannheim

Sidney L. Mannheim