



April 27, 2005

**VIA ELECTRONIC FILING**

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

**Re: El Segundo Power, LLC  
Docket No. ER05-791-000**

Dear Secretary Salas:

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

Thank you for your attention to this matter.

Yours truly,

**/s/ Sidney Mannheim Davies**  
Sidney Mannheim Davies  
Senior Regulatory Counsel

Counsel for the California Independent  
System Operator Corporation

Enclosure

cc: Service List

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

**El Segundo Power, LLC**            )     **Docket No. ER05-791-000**  
  )  
  )

**MOTION TO INTERVENE AND COMMENTS 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 April 13, 2005, Notice of Filing, the California Independent System Operator Corporation (“CAISO”) submits this Motion to Intervene and Comments in the above captioned proceeding. In support thereof, the CAISO states as follows:

**I. DESCRIPTION OF THE PROCEEDING**

On April 6, 2005, El Segundo Power, LLC (“El Segundo”) tendered for filing an amendment to Sheet Nos. 127 and 129 of its Rate Schedule, FERC No. 2, Reliability Must-Run Service Agreement (“RMR Agreement”) between El Segundo and the CAISO. El Segundo requests an effective date of January 1, 2005 for Substitute Original Sheet No. 127 and May 1, 2005 for First Revised Sheet No. 129.

**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 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 Southern California Edison Company (“SCE”), 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  
Senior Regulatory Counsel  
California Independent System  
Operator Corporation  
151 Blue Ravine Road  
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916-608-7144 (tel)  
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California Independent System  
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916-608-5804 (tel)  
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### **III. CAISO’S INTEREST**

El Segundo’s RMR Units are located within SCE’s transmission system and are 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. COMMENTS**

The CAISO has noticed certain discrepancies that it would like to bring to the Commission's attention. Concerning Substitute Original Sheet No. 127, Schedule A, Section 2 "Description of RMR Units," the third line of the Table, which specifies the Power Factor Range (lead to lag), contains a value of 0-.90. This value is inconsistent with the corresponding values of Reactive Power and Load at Maximum MVar in this table and not consistent with our understanding of the Units' capabilities. Additionally, the values presented in the table have changed from those previously on file for these Units in Docket ER98-441-000. The CAISO believes that El Segundo should be instructed to submit additional justification for these values or correct them if they are erroneous.

#### **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: April 27, 2005

Respectfully submitted,

**/s/ Sidney Mannheim Davies**  
Sidney Mannheim Davies  
California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630

**CERTIFICATE OF SERVICE**

I hereby certify that I have, this 27th day of April 2005, caused to be served a copy of the foregoing 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