

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

**San Diego Gas & Electric Co.
Cabrillo Power I LLC, and
Cabrillo Power II LLC**

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Docket No. EC99-26-000

**MOTION TO INTERVENE 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 January 15, 1999 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:

N. Beth Emery
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II. BACKGROUND

On January 12, 1999, San Diego Gas & Electric (“SDG&E”), Cabrillo Power I LLC (“Cabrillo I”) and Cabrillo Power II LLC (“Cabrillo II”) tendered for filing pursuant to Section 203 of the Federal Power Act (16 USC § 824b), an application requesting authorization for SDG&E to assign its interest in the jurisdictional Reliability Must-Run Agreement (“RMR Agreement”) between the ISO and SDG&E with respect to SDG&E’s Encina generating station to Cabrillo I, and to assign SDG&E’s interest in the RMR Agreement between the ISO and SDG&E with respect to 17 of SDG&E’s combustion turbines to Cabrillo II. SDG&E, Cabrillo I and Cabrillo II have requested that the Commission approve the assignments on or before February 28, 1999.

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 SDG&E, Southern California Edison Company, and Pacific Gas and Electric Company as well as for the coordination of the competitive electricity market in California.

At issue in this proceeding are RMR Agreements to which the ISO is a party and that could affect the reliability of the ISO-Controlled Grid. The ISO therefore has an interest in this proceeding that cannot be represented by any other party. Accordingly, the ISO requests that it be permitted to intervene herein with full rights of a party.

The ISO raises no substantial issues at the present time but reserves the right to do so in any further aspects of the proceeding ordered by the Commission.

IV. CONCLUSION

Wherefore, for the foregoing reasons, the ISO respectfully requests that the Commission permit it to intervene and that it be accorded full party status in this proceeding.

Respectfully submitted,

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Attorney for the California Independent
System Operator Corporation

Date: February 11, 1999

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. on this 11th day of February, 1999.

Mark Reid Klupt

February 11, 1999

The Honorable David P. Boergers
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: **San Diego Gas & Electric Co.
Cabrillo Power I LLC, and
Cabrillo Power II LLC
Docket No. EC99-26-000**

Dear Secretary Boergers:

Enclosed for filing are one original and 14 copies of the Motion to Intervene of the California Independent System Operator Corporation in the above-referenced proceeding. An additional copy of the filing is also enclosed. Please stamp the additional copy with the date and time filed and return it to the messenger.

Thank you for your assistance in this matter.

Respectfully submitted,

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