

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

**ORIGINAL**

FILED  
OFFICE OF THE SECRETARY  
01 MAY 10 PM 4:38  
FEDERAL ENERGY  
REGULATORY COMMISSION

San Diego Gas & Electric Company,  
Complainant,  
v.

Docket No. EL00-95-020

Sellers of Energy and Ancillary Services  
Into Markets Operated by the California  
Independent System Operator and the  
California Power Exchange,  
Respondents.

Investigation of Practices of the California  
ISO and the California Exchange

Docket No. EL00-98-019

Removing Obstacles to Increased  
Generation and Natural Gas Supply  
In the Western United States

Docket No. EL01-47-002

Section 210(d) Proceeding Applicable  
Electric Utilities in California

Docket No. EL01-72-000

**MOTION TO INTERVENE OF THE CALIFORNIA INDEPENDENT  
SYSTEM OPERATOR CORPORATION  
RE MOTIONS FOR EMERGENCY RELIEF AND  
INSTITUTION OF SECTION 210(d) PROCEEDING**

Pursuant to Rules 211 and 214 of the Rules of Practice and Procedure of  
the Federal Energy Regulatory Commission ("Commission"), 18 C.F.R.  
§§ 385.211 and 385.214 and the Commission's May 8, 2001, Notice of  
Opportunity for Comment, the California Independent System Operator  
Corporation ("ISO")<sup>1</sup> hereby moves to intervene in the above-captioned  
proceeding. In support whereof, the ISO states as follows:

010514.0044.1

FILED  
*[Signature]*  
MAY 10 2001

**I. COMMUNICATIONS**

Please address communications concerning this filing to the following persons:

Roger E. Smith,  
Senior Regulatory Counsel  
Margaret A. Rostker,  
Regulatory Counsel  
The California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
Tel: (916) 608-7135  
Fax: (916) 608-7296

**II. BACKGROUND**

Ridgewood Power LLC ("Ridgewood") submitted a Request of Emergency Relief and an Updated Request for Emergency Relief in Docket Nos. EL00-95-020 and EL00-98-019 (on March 8, 2001 and April 9, 2001, respectively) requesting the Commission to take action to prevent qualifying facilities ("QF") capacity from going off-line in the State of California and requesting the Commission to take such actions as needed to permit the QFs in California that have not been paid fully for past power deliveries to enter into arrangements to temporarily sell to third-party buyers within California. Ridgewood asked the Commission to declare that California electric utilities cannot deny transmission access to QFs or otherwise frustrate the ability of QFs to sell to third-party purchasers.

---

<sup>1</sup> Capitalized terms not otherwise defined herein have the meaning set forth in the ISO Tariff Master Definition Supplement, Appendix A.

On April 9, 2000, the California Cogeneration Council ("CCC") filed a Motion for Emergency Relief in Docket No.EL01-47-000 requesting the Commission to take action to prevent QFs from going off-line and to require interconnection, transmission and related services under §210(d) of the Federal Power Act on a temporary basis pending the resolution of accounts receivable issues. The Commission stated that it will address the CCC's Motion and responses thereto in Docket No.EL01-47-002.

The Commission also has instituted a proceeding under §210(d) on its own motion in Docket No.EL01-72-000 to consider whether and to what extent it may need to order the provision of interconnection, transmission and related services under §210(d) to alleviate generation capacity supply shortages in California.

### **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 San Diego Gas & Electric Company. The ISO, pursuant to its Commission-approved Tariff, sets forth terms and requirements that entities seeking access to the ISO Controlled Grid must meet. The ISO Tariff addresses interconnection, transmission, metering, scheduling and related services. Moreover, the ISO is responsible for ensuring nondiscriminatory access to the ISO Controlled Grid. Therefore, the ISO has a unique interest in any Commission proceeding concerning the provision of either

temporary or permanent access to the ISO Controlled Grid. This interest cannot adequately be represented by any other party. The ISO's participation in these several proceedings is, therefore, in the public interest.

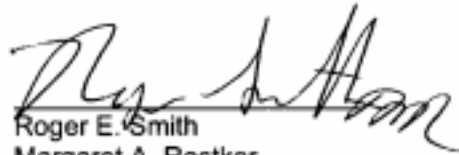
#### **IV. RESERVATION OF RIGHTS**

The ISO reserves the right to posit and address any additional issues which it or others may identify or raise within the course of these proceedings.

**VI. CONCLUSION**

WHEREFORE, for the foregoing reasons, the ISO respectfully requests that the Commission permit it to intervene in the above-captioned proceedings, that it be accorded full party status in these proceedings.

Respectfully submitted,



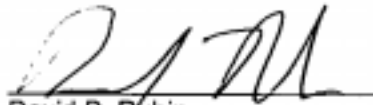
Roger E. Smith  
Margaret A. Rostker  
The California Independent  
System Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
Tel: (916) 608-7135  
Fax: (916) 608-7296

Dated: May 10, 2001

**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., this 10<sup>th</sup> day of May, 2001.



David B. Rubin  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, N.W.  
Washington, D.C. 20007

