

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

Cabrillo Power I LLC

)

Docket No. ER08-178-000

**MOTION TO INTERVENE AND COMMENTS IN SUPPORT
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 (2007), the California Independent System Operator (“CAISO”) submits this Motion to Intervene and Comments in the captioned proceeding. In support thereof, the CAISO states as follows:

I. Description of the Proceeding

On November 1, 2007, Cabrillo Power I LLC (“Cabrillo I”) tendered for filing rate schedule sheets consisting of two executed Interim Service Agreements between Cabrillo I and the CAISO: (i) the Interim Dual Fuel Agreement designated as Cabrillo Power I, Original Rate Schedule FERC No. 3, and (ii) the Interim Black Start Agreement, designated as Cabrillo Power I, Original Rate Schedule FERC No. 4. Under the Interim Agreements, Cabrillo I will provide the CAISO with Black Start and Dual Fuel services. Cabrillo I requests an effective date of January 1, 2008 for these two rate schedules.

The Commission issued a Combined Notice of Filings setting November 23, 2007 as the deadline for interventions in this proceeding.

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 of the transmission systems of a number of public utilities including San Diego Gas & Electric Company (“SDG&E”), 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:

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III. Motion to Intervene

As the Control Area Operator and as the counter party to the Interim Agreements, the CAISO has a unique interest in this proceeding. Accordingly, the CAISO has a direct and substantial interest 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, the CAISO’s intervention is in the public interest and should be granted.

IV. Comments in Support

Effective January 1, 2008, these Interim Agreements will supplant the Reliability Must-Run Agreement currently in effect between the CAISO and Cabrillo I. Accordingly, the CAISO

supports Cabrillo I's request that the Commission accept the attached rate schedules effective January 1, 2008.

IV. Conclusion

For the foregoing reasons, the CAISO respectfully requests that the Commission grant the CAISO's motion to intervene and make the CAISO a party in the above-captioned proceeding with full rights of participation and take into consideration the CAISO's comments.

Respectfully submitted,

/s/ Mary Anne Sullivan _____

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Counsel for
California Independent System
Operator Corporation

Dated: November 21, 2007

CERTIFICATE OF SERVICE

I hereby certify that I have this 21st day of November, 2007 caused to be served a copy of the forgoing Motion to Intervene and Comments in Support upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

/s/ Karin L. Larson
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