



California Independent  
System Operator Corporation

November 27, 2006

**Via Electronic Filing**

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

**Re: San Diego Gas and Electric Company  
Palomar Energy Center Facility  
Docket No. ER07-167-000**

Dear Secretary Salas:

Transmitted herewith for electronic filing in the above-referenced proceedings is the Motion to Intervene Out of Time of the California Independent System Operator Corporation.

Thank you for your attention to this matter.

Yours truly,

**/s/ Sidney Mannheim Davies**

Sidney Mannheim Davies  
Assistant General Counsel  
Counsel for the California Independent  
System Operator Corporation

Enclosure  
cc: Service List



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 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:

Sidney Mannheim Davies  
Assistant General Counsel  
California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
Tel: (916) 608-7144  
Fax: (916) 608-7222  
E-mail: [sdavies@caiso.com](mailto:sdavies@caiso.com)

Robert C. Kott  
Manager of Model and Contract  
Implementation  
California Independent System  
Operator Corporation  
151 Blue Ravine Road  
Folsom, CA 95630  
Tel: (916) 608-5804  
Fax: (916) 351-2487  
E-mail: [rkott@caiso.com](mailto:rkott@caiso.com)

### **III. CAISO’S INTEREST**

Palomar Energy Center (“Facility”) is located within SDG&E’s transmission system and has been needed to maintain the reliability of the ISO Controlled Grid. As the Control Area operator and as the counter party to the RMR Agreements, 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.

Based on the fact that SDG&E has procured adequate Local Area Resource Adequacy Resources, the CAISO has determined that it no longer needs this resource to provide reliability services under the RMR Agreement. Accordingly, the CAISO notified SDG&E that it would not be extending the term of the RMR Agreement and requested SDG&E to file a Notice of Cancellation, to which the CAISO does not object.

**IV. MOTION TO INTERVENE OUT OF TIME**

Due to an administrative oversight, the CAISO failed to file this motion by the date specified in the November 7, 2006, Combined Notice of Filings. Given the early status of the proceeding, however, no party will be prejudiced by the granting of the motion.

**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: November 27, 2006

Respectfully submitted

**/s/ Sidney Mannheim Davies**  
Sidney Mannheim Davies

Counsel for the California Independent  
System Operator Corporation

**CERTIFICATE OF SERVICE**

I hereby certify that I have, this 27<sup>th</sup> day of November 2006, caused to be served a copy of the forgoing 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