



November 8, 2005

The Honorable Magalie Roman Salas
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

**Re: San Diego Gas and Electric Company
Docket No. ER06-50-000**

Dear Secretary Salas:

Enclosed please find an electronic filing of the Motion to Intervene and Comments of the California Independent System Operator Corporation.

Thank you for your attention to this filing.

Respectfully submitted,

/s/ Sidney Mannheim Davies
Sidney Mannheim Davies

Counsel for the California Independent
System Operator Corporation

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

San Diego Gas and Electric Company)))	Docket No. ER06-50-000
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**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 October 26, 2005, Notice of Filing, the California Independent System Operator Corporation (“CAISO”) hereby moves to intervene and comment in the above-captioned proceeding.¹ In support thereof, the CAISO states as follows:

I. COMMUNICATIONS

Please address communications concerning this filing to the following persons:

¹ Capitalized terms not otherwise defined herein are defined in the Master Definitions Supplement, Appendix A to the ISO Tariff, as filed August 15, 1997, and subsequently revised.

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II. BACKGROUND

On October 18, 2005, San Diego Gas and Electric Company (SDG&E) submitted an informational filing in support of its proposed revisions to its Transmission Revenue Requirements for the Revised CAISO Transmission Access Charge rates that went into effect 01/01/2005. On November 8, 2005, SDG&E submitted an errata filing.

III. BASIS FOR MOTION TO INTERVENE

The CAISO is a non-profit public benefit corporation organized under the laws of the State of California and is responsible for the reliable operation of a grid comprising the transmission systems of Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Trans-Elect NTD Path 15 LLC, Western Area Power Administration - Sierra Nevada Region and the Cities of Vernon, Anaheim, Azusa, Banning Riverside and Pasadena, California. SDG&E's filing relates to the CAISO's TAC.

² In addition to Ms. Davies and Mr. Ward, the ISO respectfully requests that Ms. Le Vine be included on the Official Service List. Ms. Davies and Ms. Le Vine work in separate buildings, and it would be of significant assistance to the ISO if both were included on the list.

Accordingly, the CAISO a unique interest in any Commission proceeding concerning the issues raised in the captioned proceeding.

IV. COMMENTS

Following discussions between SDG&E and the CAISO, SDG&E has agreed to make certain changes through an errata filing. SDG&E submitted its errata filing on November 8, 2005. This filing resolves the CAISO's concerns.

V. CONCLUSION

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

Respectfully submitted,

/s/ Sidney Mannheim Davies

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Date: November 8, 2005

CERTIFICATE OF SERVICE

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

Dated at Folsom, CA, this 8th day of November, 2005.

/s/ Sidney Mannheim Davies
Sidney Mannheim Davies