

October 2, 2006

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

**Re: North American Electric Reliability Council and North American
Reliability Corporation
Docket No. RR06-1-002**

Dear Secretary Salas:

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

Thank you for your attention to this filing.

Respectfully submitted,

/s/ Anthony J. Ivancovich
Anthony J. Ivancovich

Counsel for the California Independent
System Operator Corporation

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

**North American Electric Reliability)
Council and North American) Docket No. RR06-1-002
Reliability Corporation)**

**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 September 20, 2006 Notice of Filing, the California Independent System Operator Corporation (“CAISO”) hereby moves to intervene in the above-captioned proceeding.

In support thereof, the CAISO states as follows:

I. COMMUNICATIONS

Please address communications concerning this filing to the following person:

Anthony J. Ivancovich
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California Independent System
Operator Corporation
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II. BACKGROUND

On September 18, 2006, the North American Electric Reliability Council and its affiliate, North American Electric Reliability Corporation, collectively, NERC) filed a compliance filing addressing various governance issues identified in the Commission's order certifying NERC as the Electric Reliability Organization (ERO).

By its Notice of Filing issued September 20, 2006 the Commission established October 2, 2006 as the date motions to intervene are to be filed in the above-captioned proceeding.

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 transmission grid comprised of transmission facilities owned by Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Trans-Elect NTD Path 15 LLC, and the Cities of Vernon, Anaheim, Azusa, Banning, Riverside and Pasadena, California. As the operator of this regional transmission grid, as well as the operator of organized electricity and Ancillary Services markets, the CAISO has a significant and unique interest in the captioned proceeding that cannot be adequately represented by any other party. Moreover, the CAISO is a member of one of the industry segments that will be represented on the ERO's Member Representatives Committee, Standards Committee and in the Registered Ballot Body. Further, the CAISO will be

impacted by any Commission action in this proceeding. Accordingly, the CAISO should be permitted to intervene with full rights as a party.

IV. CONCLUSION

For the foregoing reasons, the CAISO respectfully requests that the Commission permit it to intervene, and that the CAISO be accorded full party status in this proceeding. The CAISO also requests that the Commission act on NERC's ERO application in a manner consistent with the discussion herein.

Respectfully submitted,

/s/ Anthony J. Ivancovich

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Counsel for the California Independent
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Date: October 2, 2006

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 2nd day of October 2006

/s/ Anthony J. Ivancovich
Anthony J. Ivancovich