MOTION TO INTERVENE OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION


I. COMMUNICATIONS

Please address communications concerning this filing to the following persons:

N. Beth Emery
Vice President and General Counsel
Roger E. Smith, Regulatory Counsel
The California Independent System Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630
Tel: (916) 351-2334
Fax: (916) 351-2350

Kenneth G. Jaffie
David B. Rubin
Sean A. Atkins
Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W.
Washington, D.C. 20007
Tel: (202) 424-7500
Fax: (202) 424-7643

II. BACKGROUND

On October 2, 1998, Sierra Pacific Power Company (“Sierra”) filed for Commission approval the Alturas Intertie Project Interconnection and Operation and Maintenance Agreement (“Agreement”) between Sierra, the Bonneville Power Administration (“Bonneville”), and PacifiCorp. The Agreement governs: (1) ownership of the new facilities to be constructed as part of the Alturas Intertie Project; (2) assignment of responsibility for operation and maintenance of those facilities; and
(3) the interconnected operation of the Project. The Alturas Intertie Project consists of an approximately 200 mile long 345 kV transmission line from Sierra’s North Valley Road Substation, north of Reno, Nevada, to Sierra’s Hilltop Substation near Alturas California. The Project will be interconnected with Bonneville’s Malin-Warner transmission line, to be located in Bonneville’s control area, and will terminate at PacifiCorp’s Malin Substation facilities. The Project is currently under construction and is expected to be completed and the line placed in service in December 1998. Sierra is therefore requesting that the Agreement be approved without modification or suspension, to be effective as of December 1, 1998.

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. As part of this function, the ISO is responsible for coordination with control areas interconnected with the ISO’s Control Area. The ISO has therefore entered into Interconnected Control Area Operating Agreements with Sierra and PacifiCorp. The ISO has also entered into Scheduling Coordinator Agreements with various California Market Participants, including PacifiCorp and Bonneville. The ISO therefore has a unique interest in any FERC proceedings that could impact on the operation of the ISO-Controlled Grid or affect coordination with interconnected control areas.

At this time, the ISO is not raising any substantive issues concerning the Agreement submitted by Sierra in this proceeding. The ISO notes that, pursuant to Section 12(c) of the Agreement, Sierra, Bonneville and PacifiCorp are currently negotiating guidelines to provide further detail regarding the
scheduling of power and operation of the Alturas Intertie Project. The ISO reserves the right to modify its pleadings to address any substantive issue arising in this proceeding in the future.

IV.  CONCLUSION

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

Respectfully submitted,

__________________________________________
N. Beth Emery  
Vice President and General Counsel
Roger E. Smith, Regulatory Counsel
The California Independent System Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630
Tel: (916) 351-2334
Fax: (916) 351-2350

__________________________________________
Kenneth G. Jaffe  
David B. Rubin
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Swidler Berlin Shereff Friedman, LLP
3000 K Street, N.W.
Washington, D.C.  20007
Tel: (202) 424-7500
Fax: (202) 424-7643

Attorneys for the California Independent System Operator Corporation

Date: October 22, 1998
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 Docket No. ER99-28-000, in accordance with the requirements of Rule 2010 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.2010.

Dated at Washington, D.C. on this 22nd day of October, 1998.

________________________________________
Sean A. Atkins
October 22, 1998

The Honorable David P. Boergers
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C.  20426

Re:  Sierra Pacific Power Company
     Docket No. ER99-28-000

Dear Secretary Boergers:

Enclosed for filing is one original and 14 copies of the Motion to Intervene of the California Independent System Operator Corporation in the above-referenced docket. An additional copy of the filing is also enclosed. Please stamp the additional copy with the date and time filed and return it to the messenger.

Thank you for your assistance in this matter.

Respectfully submitted,

Kenneth G. Jaffe
David B. Rubin
Sean A. Atkins

Attorneys for the California
Independent System Operator Corporation