

STATE OF CALIFORNIA

ARNOLD SCHWARZENEGGER, *Governor*

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 28, 2008

Via Electronic Delivery

Kimberly D. Bose, Secretary
Office of the Secretary
Docket Room
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A, East
Washington, D.C. 20002

**Re: California Independent System Operator Corporation
Docket No. ER08-960-000**

Dear Ms. Bose:

Enclosed for filing in the above-docketed case, please find an original electronic filing of the attached document entitled **“NOTICE OF INTERVENTION OF THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA.”**

Thank you for your cooperation in this matter.

Sincerely,

/s/ Laurence G. Chaset

Laurence G. Chaset
Staff Attorney

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

California Independent System Operator
Corporation

Docket No. ER08-960-000

**NOTICE OF INTERVENTION
OF THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA**

Pursuant to Rule 214(a)(2) of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“FERC”) and the FERC’s Combined Notice of Filings dated May 19, 2008, the Public Utilities Commission of the State of California (“CPUC”) hereby intervenes in the above-docketed proceeding.

The California Independent System Operator Corporation (“CAISO”) filed this waiver petition as the initial step in a two-step process to reform the CAISO’s current Large Generator Interconnection Procedures (“LGIP”). This reform will allow the CAISO both to manage its interconnection queue more efficiently and to be consistent with the pace for development of new transmission needed both to ensure reliability and to facilitate compliance with California's Renewables Portfolio Standard (“RPS”) requirements.

The general structure of these needed LGIP reforms was discussed by representatives of the CAISO and the CPUC at a Technical Conference that was held on December 11, 2007 at the Commission’s Headquarters in Docket AD08-2-000, Interconnection Queuing Practices. Subsequent to that Technical Conference, the Commission issued an Order in Docket AD08-2-000 on March 20, 2008, which urged the

CAISO and other independent system operators and regional transmission organizations to improve the processing of their respective interconnection queues. The CPUC would note that since before the date of the December 2007 Technical Conference, it has been working closely with the CAISO and other stakeholders toward the goal of accomplishing the reforms to the current LGIP of which the instant waiver request is one of the elements.

The second step in the CAISO's LGIP reform process is anticipated to involve a CAISO filing sometime in the next several months that will seek to revise the CAISO Tariff to incorporate the substance of the CAISO's Generator Interconnection Process Reform ("GIPR"). The GIPR itself has been in active development since early this year via an open and collaborative stakeholder process, in which the CPUC has been an active participant.

As it engages in a full-scale reform of its LGIP, the CAISO has determined that certain steps must be taken to streamline the processing of pending Interconnection Requests and to facilitate the transition to a new paradigm for addressing the interconnection queue. However, all parties to the GIPR process agree that the timely interconnection of renewable resources to planned and approved transmission lines should not, in any way, be impeded by the on-going efforts to reform the LGIP process. Accordingly, the GIPR is expected to incorporate an accelerated study process to ensure the timely interconnection of renewable resources to new transmission projects that have received applicable state and federal approvals. By focusing its efforts, in part, on expediting the interconnection of renewable resources to planned and approved transmission projects, the waiver that the CAISO is seeking in this Docket supports the goal of the California RPS, which is to supply 20% of energy deliveries within the State

from renewable resources by 2010.

The CPUC is a constitutionally established agency charged with the responsibility for regulating electric corporations within the State of California. In addition, the CPUC has a statutory mandate to represent the interests of electric consumers throughout California in proceedings before the FERC.

Communications to the CPUC in this proceeding should be addressed to:

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This intervention serves to make the CPUC a party to these proceedings.

The CPUC generally supports the CAISO's waiver request, although we have no specific comments at this time to submit in connection with the CAISO's filing.

Dated: May 28, 2008

Respectfully submitted,

LIONEL B. WILSON
HARVEY Y. MORRIS
LAURENCE G. CHASET

By: *Laurence G. Chaset*

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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing document to be served upon all known parties in this proceeding by e-mail upon each party identified in the official service list compiled by the Secretary in this proceeding.

Dated at San Francisco, California, this 28th day of May, 2008.

/s/ Laurence G. Chaset

Laurence G. Chaset

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