

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

Pacific Gas and Electric Company)

Docket No. ER98-2351-000

**MOTION TO INTERVENE OF THE CALIFORNIA INDEPENDENT
SYSTEM OPERATOR CORPORATION**

Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, the California Independent System Operator Corporation (ISO) hereby moves to intervene in the captioned proceeding. In support of its motion, the ISO states the following:

1. The following persons should be included on the official service list in this proceeding, and all communications concerning this motion should be addressed to them:

N. Beth Emery
William G. Hayes
California Independent System Operator Corporation
151 Blue Ravine Road
Folsom, CA 95630
Tel: (916) 351-2334
Fax: (916) 351-2350

Stephen Angle
Linda L. Walsh
Howrey & Simon
1299 Pennsylvania Avenue, NW
Washington, DC 20004
Tel: 202-383-7261
Fax: 202-383-6610

2. The ISO's principal place of business is located at 151 Blue Ravine Road, Folsom, CA 95630. The ISO is a non-profit public benefit corporation organized and existing under the laws of the State of California. Since March 31, 1998, the ISO has been operating the ISO Controlled Grid that is initially composed of the transmission systems of Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas and Electric Company (SDG&E). The ISO is responsible for the reliability of electric

transmission that is scheduled through the grid. The ISO's activities are subject to the Commission's jurisdiction.

3. On March 30, 1998, PG&E filed amendments to its Transmission Owners Tariff (TO Tariff) originally filed in Docket No. ER97-2364-000. The Commission noticed the filing on April 8, 1998.

4. The ISO requests intervention in this proceeding. As the entity responsible for the reliable operation of the transmission grid involving the facilities of PG&E, SCE and SDG&E, the ISO has an interest, which may be directly affected by the outcome of this proceeding.

WHEREFORE, the ISO requests that it be permitted to intervene as a party in this proceeding.

Respectfully submitted,

**CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORPORATION**

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Dated: April 21, 1998

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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 proceeding.

Dated the 21st day of April 1998

Linda L. Walsh