

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

Pacific Gas and Electric Company)
) **Docket No. ER99-4323-000**
)

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

Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214, the Commission's September 9, 1999, Notice and the Commission's September 16, 1999, Notice of Extension of Time, the California Independent System Operator Corporation ("ISO") hereby moves to intervene in the above-identified proceeding.

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 ("PG&E"), San Diego Gas and Electric Company, and Southern California Edison Company (the "ISO Controlled Grid"). This proceeding concerns a Transmission Owner Tariff ("TO Tariff") filed by PG&E that includes wholesale and retail rates for the transmission service that the ISO provides on the ISO Controlled Grid. Under the ISO Tariff, the ISO is responsible for the settlement of certain of these charges. The ISO therefore has a unique interest in any FERC proceedings that concern rates for service on the ISO Controlled Grid.

The ISO should therefore be permitted to intervene in this proceeding.

COMMUNICATIONS

Please address communications concerning this filing to the following

persons:

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CONCLUSION

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

Respectfully submitted,

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Attorneys for the California Independent System Operator Corporation

Date: September 22, 1999

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. ER99-4323-000, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010 (1998).

Dated at Washington, D.C. on this 22nd day of September, 1999.

Michael E. Ward

September 22, 1999

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

Re: Pacific Gas and Electric Company
Docket No. ER99-4323-000

Dear Secretary Boergers:

Enclosed for filing are one original and 14 copies of the Motion to Intervene of the California Independent System Operator Corporation in the above-identified 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,

Michael E. Ward
Counsel for the California
Independent System Operator Corporation