

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

**Geysers Power Company**

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**Docket No. ER00-894-000**

**MOTION TO INTERVENE AND LIMITED PROTEST OF  
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION**

Pursuant to Rule 211 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. §§ 385.211, 385.214, the California Independent System Operator Corporation (“ISO”) hereby moves to intervene in the above-captioned proceeding and files this protest. In support thereof, the ISO states as follows:

**I. COMMUNICATIONS**

Please address communications concerning this filing to the following persons:

Roger E. Smith, Senior Regulatory  
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**II. BACKGROUND**

On December 22, 1999, Geysers Power Company (“Geysers Power”) tendered for filing with the Commission revised Rate Schedules for Reliability Must-Run services provided to the ISO pursuant to Geysers Power’s Must Run Agreement on file with the

Commission. Geysers Power states that it is implementing settlement rates, updating those provisions of the Rate Schedules that must be updated annually under the Commission's regulations, and updating the Maximum Net Dependable Capacity values.

### **III. BASIS FOR MOTION TO INTERVENE**

The ISO is a non-profit public benefit corporation organized under the laws of the State of California. It is responsible for the reliable operation of a grid comprising the transmission systems of Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company, as well as for the coordination of the competitive electricity market in California. The ISO is the purchaser of the services provided under the rate schedules that are the subject of this proceeding. The ISO therefore has an interest in this proceeding. Accordingly, the ISO requests that it be permitted to intervene in this proceeding with full rights of a party.

### **IV. LIMITED PROTEST**

Pursuant to sections I.C.2 and I.C.3 of the Stipulation and Agreement filed in Docket Nos. ER98-441-000, et al., and approved by the Commission on May 28, 1999, the right of Geysers Power under Sections 205 and 206 of the Federal Power Act (16 U.S.C. § 825d) to file to revise the Must Run Agreement is, with certain exceptions, suspended through December 31, 2001. The revisions to the Maximum Net Dependable Capacity values do not fall into one of the specified exceptions. The ISO cannot at this time waive its right to object under sections I.C.2 and I.C.3. First, Geysers Power has not sought the concurrence of the ISO or of Pacific Gas and Electric Company, the utility to whom the ISO allocates the costs of the services under the Must Run Agreement at issue. The ISO notes

that, in another recent filing, the ISO was willing to waive its objections under section I.C.2 because the Reliability Must Run Owners had worked out the revisions with the responsible utility.

In addition, Geysers Power's filing does not set forth clearly the relationship between the geothermal Field Capacity Test and the need for a revision of Maximum Net Dependable Capacity. The ISO is thus unable to determine whether the requested revisions are justified.

The ISO therefore protests the revisions to the Maximum Net Dependable Capacity and requests their rejection at this time.

The ISO does not at this time object to Geysers Power's implementation of settlement rates or the update of contract service limits, Schedule B values, and start-up costs, which are included in the exceptions.

## **V. CONCLUSION**

Wherefore, for the foregoing reasons, the ISO respectfully requests that the Commission permit it to intervene, that it reject the revisions to Maximum Net Dependable Capacity, or that it suspend the filing and set the matter for hearing.

Respectfully submitted,

Roger E. Smith, Senior Regulatory  
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Counsel for the California Independent  
System Operator Corporation

Date: January 11, 2000

## **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 at Washington, DC, on this 11<sup>th</sup> day of January, 2000.

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Michael E. Ward

January 11, 2000

The Honorable David P. Boergers  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

Re: **Geysers Power Company,  
Docket No. ER00-894-000**

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-referenced proceeding. Two additional copies of the filing are also enclosed. Please stamp the two additional copies with the date and time filed and return them to the messenger.

Thank you for your assistance in this matter.

Respectfully submitted,

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