

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

Pacific Gas and Electric Company)
) **Docket No. ER00-2866-000**
)

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

Pursuant to Rule 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. § 385.214, and the Commission’s June 21, 2000, Notice of Filing, the California Independent System Operator Corporation (“ISO”) hereby moves to intervene in the above-captioned proceeding. In support thereof, the ISO states as follows:

I. COMMUNICATIONS

Please address communications concerning this filing to the following persons:

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II. BACKGROUND

On June 15, 2000, Pacific Gas and Electric Company (“PG&E”) tendered for filing an Emergency Demand Relief Service Agreement Between Pacific Gas and Electric Company and City and County of San Francisco (“CCSF”). As described by PG&E, the agreement is intended to facilitate CCSF’s participation in the ISO’s Demand Relief Program to support reliability of the electric grid in California during the summer of 2000.¹ Under the agreement, PG&E will provide information to the ISO regarding curtailment of loads designated by CCSF when requested by the ISO to meet reserve and reliability requirements, and pass through payments from the ISO to CCSF.²

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 PG&E, San Diego Gas & Electric Company, and Southern California Edison Company, as well as for the coordination of the competitive electricity market in California. As the operator of this grid and the administrator of the Demand Relief Program, the ISO believes that it has a unique interest in any Commission proceeding concerning the agreement submitted. The ISO has an interest in decisions concerning the provision of information to the ISO as to curtailment of loads designated by CCSF, and in decisions concerning the passing through of payments from the

¹ PG&E Transmittal Letter at 1. The Commission approved the Demand Relief Program, as modified, in *California Independent System Operator Corporation*, 91 FERC ¶ 61,256 (2000).

² PG&E Transmittal Letter at 1.

ISO to CCSF. Accordingly, the ISO requests that it be permitted to intervene herein with full rights as a party.

The ISO raises no substantive issues at the present time but reserves the right to do so regarding any further aspects of the proceeding ordered by the Commission. The ISO also reserves the right to file supplemental comments if warranted.

IV. CONCLUSION

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

Respectfully submitted,

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