

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

Pacific Gas and Electric Company)
) Docket No. ER01-2998-000
)

**MOTION TO INTERVENE OUT-OF-TIME
OF THE CALIFORNIA INDEPENDENT OPERATOR CORPORATION**

Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. §§ 385.212, 385.214 (2001), and the Commission’s September 7, 2001, Notice of Filing and September 19, 2001 Notice of Extension of Time, the California Independent System Operator Corporation (“ISO”) hereby moves to intervene in the above-captioned proceeding out-of-time.

I. COMMUNICATIONS

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II. BACKGROUND

On August 31, 2001, Pacific Gas and Electric Company (“PG&E”) filed with the Commission a Notice of Termination of the 1992 Interconnection Agreement between PG&E and the Northern California Power Agency (“NCPA”), PG&E Revised Rate Schedule FERC No. 142 (“Existing IA”) and an unexecuted Interconnection Agreement

("Proposed IA") between PG&E and NCPA. The Proposed IA supersedes the Existing IA and is intended to provide for the continued interconnection of the PG&E and NCPA electric systems.

III. BASIS FOR MOTION TO INTERVENE OUT-OF-TIME

The ISO is a non-profit public benefit corporation organized under the laws of the State of California and 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.

As the entity responsible for the reliable operation of the transmission systems listed above, the ISO has an interest in the proceeding that cannot adequately be represented by any other party.

Due to the press of other business, the ISO was unaware of this proceeding until recently. As the above captioned proceeding is still in its early stages and no procedural schedule has yet been established, no party would be prejudiced by the Commission's grant of this motion.

In addition, the ISO's participation in this proceeding is in the public interest. Because the ISO is responsible for the maintenance and reliable and the nondiscriminatory operation of the ISO Controlled Grid, it can provide the Commission with important information regarding the impact of the Proposed IA on users of the ISO Controlled Grid.

IV. CONCLUSION

Wherefore, because no other party can adequately represent the interests of the ISO, no party would be prejudiced by the Commission's grant of this motion, and participation by the ISO in this proceeding is in the public interest, the ISO respectfully requests that the Commission permit it to intervene out-of-time, and that it be accorded full party status in this proceeding.

Respectfully submitted,

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