

### August 14, 2006

### Via Electronic Filing

The Honorable Magalie R. Salas Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, D.C. 20426

Re: Pacific Gas and Electric Company

Docket No. ER06-1332-000

Dear Secretary Salas:

Transmitted herewith for electronic filing in the above-referenced proceedings is the Intervention and Provisional Protest of the California Independent System Operator Corporation.

Thank you for your attention to this matter.

Yours truly,

### /s/ Sidney Mannheim Davies

Sidney Mannheim Davies
Assistant General Counsel
Counsel for the California Independent
System Operator Corporation

Enclosure cc: Service List

# UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

Pacific Gas and Electric Company ) Docket No. ER06-1332-000

# INTERVENTION AND PROVISIONAL PROTEST 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 August 4, 2006, Combined Notice of Filing, the California Independent System Operator Corporation ("CAISO") submits this Intervention and Provisional Protest in the above captioned proceeding. In support thereof, the CAISO states as follows:

### I. DESCRIPTION OF THE PROCEEDING

On July 11, 2006, Pacific Gas and Electric Company ("PG&E") submitted the Revised Ramp Rate Sheets for PG&E's Hydroelectric Facilities under the Reliability Must-Run ("RMR") Service Agreements with the CAISO.

- Helms Power Plant ("Helms"), PG&E First Revised Rate Schedule FERC No. 207; and
- San Joaquin Power Plant ("San Joaquin"), PG&E First Revised Rate Schedule FERC No. 211

By its Notice issued August 4, 2006, the Commission established August 14, 2006, as the date motions to intervene; comments and/or protests are to be filed in the above-captioned proceeding.

### II. DESCRIPTION OF THE CAISO AND COMMUNICATIONS

The CAISO is a non-profit public benefit corporation organized under the laws of the State of California with its principal place of business at 151 Blue Ravine Road, Folsom, CA 95630. The CAISO is the Control Area operator responsible for the reliable operation of the electric grid comprising the transmission systems of a number of utilities including PG&E as well as the coordination of the ancillary services and real-time electricity markets in California.

The CAISO requests that all communications and notices concerning this motion and these proceedings be provided to:

Sidney Mannheim Davies
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Operator Corporation
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#### III. CAISO'S INTEREST

As the Control Area Operator and as the counter party to the RMR Agreement, the CAISO has a unique interest in any Commission proceeding that affects an RMR Agreement. Accordingly, the CAISO has a direct and substantial interest in this proceeding and requests that it be permitted to intervene. Because no other party can adequately represent the CAISO's interests in this proceeding, the CAISO's intervention is in the public interest and should be granted.

IV. PROVISIONAL PROTEST

PG&E's proposed revised rate schedules reflecting revised ramp rates for

Helms and San Joaquin are incorrect in that the Minimum Load table and the first

segment of the revised ramp rates should be the same and in PG&E's filing they

have different values and several ramp rates are missing or incorrect. Also, the

effective date should be September 1, 2006 to coordinate with the changes

PG&E will be submitting to update CAISO's Master File. The CAISO

understands that PG&E is aware of this error and will be filing corrected rate

schedule sheets in the near future.

V. CONCLUSION

For the foregoing reasons, the CAISO respectfully requests that the

Commission grant this Provisional Protest and direct PG&E to file corrected rate

schedule sheets reflecting the appropriate ramp rate tariff sheets if PG&E has not

done so.

Dated: August 14, 2006

Respectfully submitted

/s/ Sidney Mannheim Davies

Sidney Mannheim Davies California Independent System **Operator Corporation** 151 Blue Ravine Road

Folsom, CA 95630

(916) 608-7144 (tel)

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## **CERTIFICATE OF SERVICE**

I hereby certify that I have, this 14<sup>th</sup> day of August 2006, caused to be served a copy of the forgoing document upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

<u>/s/ Sidney Mannheim Davies</u> Sidney Mannheim Davies