

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

Pacific Gas and Electric Company) Docket No. ER10-2054-000

**MOTION TO INTERVENE AND COMMENTS 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 July 30, 2010, Combined Notice of Filings, the California Independent System Operator Corporation (ISO) submits this motion to intervene and comments in the above captioned proceeding.

I. DESCRIPTION OF THE PROCEEDING

On July 29, 2010, Pacific Gas and Electric Company (PG&E) submitted proposed revisions to the Interim Black Start Agreement between PG&E and the ISO. The purpose of the proposed revisions is to substitute a new generating unit in place of a unit scheduled for retirement and to update P&GE's contact information. PG&E also requests waiver of any applicable rules or regulations, including waiver of the Commission's notice requirements set forth in Section 35.3, 18 C.F.R. § 35.11. By its notice issued July 30, 2010, the Commission established August 19, as the date motions to intervene are to be filed in the above-captioned proceeding.

II. DESCRIPTION OF THE ISO AND COMMUNICATIONS

The ISO 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 ISO is the Balancing Authority 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 ISO requests that all communications and notices concerning this motion and these proceedings be provided to:

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III. THE ISO'S INTEREST

PG&E provides Black Start services to the ISO through the Interim Black Start Agreement with the ISO. Black Start capability is an important and necessary reliability service. As the Balancing Authority Area operator and as the counter party to the Interim Black Start Agreement, the ISO has a unique interest in any Commission proceeding that affects the agreement. Accordingly, the ISO 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 ISO's interests in this proceeding, the ISO's intervention is in the public interest and should be granted.

IV. COMMENTS

The ISO supports PG&E's revisions to the Interim Black Start Agreement and urges the Commission to accept them as requested by PG&E.

V. CONCLUSION

For the foregoing reasons, the ISO respectfully requests that the Commission grant this Motion to Intervene and make the ISO a party in the above-caption proceeding with full rights of participation.

Dated: August 19, 2010

Respectfully submitted

/s/ Sidney Mannheim Davies
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CERTIFICATE OF SERVICE

I hereby certify that I have, this 19th day of August, 2010, 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.

Is/ Anna Pascuzzo

Anna Pascuzzo