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

Pacific Gas & Electric Co. ) Docket No. ER06-33-000

## MOTION TO INTERVENE AND COMMENTS OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION

Pursuant to Rules 211 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission ("Commission"), 18 C.F.R. §§ 385.211 and 385.214 (2005), the California Independent System Operator Corporation ("CAISO") submits this Motion to Intervene and Comments. In support thereof, the CAISO states as follows:

## I. Description of the Proceeding

On October 13, 2005, Pacific Gas and Electric Company ("PG&E") submitted, pursuant to Section 205 of the Federal Power Act ("FPA"), revisions to its First Revised Rate Schedule FERC No. 208 ("Rate Schedule") for the Reliability Must-Run Service Agreement ("RMR Agreement") between PG&E and the CAISO for PG&E's Humboldt Bay Power Plant ("Humboldt Bay"). PG&E requests a December 1, 2005 effective date for the revised rate schedule. The Commission issued a Combined Notice of Filings, setting November 3, 2005 as the comment date for interventions and comments in this 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 a 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 a grid comprising of 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 Robert C. Kott Assistant General Counsel Manager of Reliability Contracts California Independent System California Independent System **Operator Corporation Operator Corporation** 151 Blue Ravine Road 151 Blue Ravine Road Folsom, CA 95630 Folsom, CA 95630 916-608-7144 (tel) 916-608-5804 (tel) 916-608-7222 (fax) 916-351-2487 (fax) sdavies@caiso.com rkott@caiso.com Mary Anne Sullivan Karin L. Larson Hogan & Hartson L.L.P. Hogan & Hartson L.L.P. 555 Thirteenth Street, N.W. 555 Thirteenth Street, N.W. Washington, D.C. 20004 Washington, D.C. 20004

202-637-3695 (tel) 202-637-5910 (fax) masullivan@hhlaw.com

202-637-6861 (tel) 202-637-5910 (fax) kllarson@hhlaw.com

Please place each of the above persons on the official service list for this proceeding

pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure. 18

C.F.R. § 385.2010 (2005).

#### III. Motion to Intervene

Humboldt Bay is located within PG&E's transmission system and is

needed to maintain system reliability. As the Control Area Operator responsible for

maintaining reliability of PG&E's transmission system and as the counter party to

the RMR Agreement, the CAISO has a unique interest in any Commission

proceeding concerning proposed changes to the RMR Agreement. Accordingly, the CAISO has a direct and substantial interest in the proposed changes in this proceeding and requests that it be permitted to intervene with full rights of a party. 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.** Comments

PG&E has revised its Rate Schedule to separate the previously combined unit data used for dispatching Humboldt Bay Mobile Units 2 and 3 in anticipation of the units being connected to the transmission grid through separate meters effective December 1, 2005. To date, Mobile Units 2 and 3 have been connected to the transmission grid through a single aggregated generation meter, and the CAISO has metered the units as a single unit. There are two steps PG&E must take to achieve separate metering of the units in question. PG&E must: (1) submit for CAISO approval updated Meter Service Agreement for ISO Metered Entities ("MSA/ISOME") and Participating Generator Agreement ("PGA") which reflects new Resource IDs for the individual meters, and (2) submit for CAISO approval a Resource Data Template ("RDT") which is used to update the CAISO's Master File with the Resource ID information. Accordingly, before CAISO can dispatch Mobile Units 2 and 3 individually, PG&E must complete these administrative steps to integrate the new meters with the CAISO's operations. PG&E needs to take action soon to achieve a December 1 effective date. Therefore, the CAISO requests that the Commission condition its acceptance of the revised

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Rate Schedule on PG&E submitting for the CAISO's approval the updated MSA/ISOME, PGA and RDT.

### V. Conclusion

For the foregoing reasons, the CAISO respectfully requests that the Commission grant the CAISO's motion to intervene in the above-captioned proceeding with full rights of a party and, in consideration of the CAISO's comments, condition the acceptance of the revised Rate Schedule as described above.

Respectfully submitted

# /s/ Karin L. Larson

Karin L. Larson Mary Anne Sullivan Hogan & Hartson L.L.P. 555 13th Street, N.W. Washington, D.C. 20004

Counsel for California Independent System Operator Corporation

Dated: November 3, 2005

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this 3<sup>rd</sup> day of November, 2005 caused to be served a copy of the forgoing Motion to Intervene and Comments upon all parties listed on the official service list compiled by the Secretary of the Federal Energy Regulatory Commission in this proceeding.

/s/Karin L. Larson

Karin L. Larson Hogan & Hartson L.L.P. 555 13th Street, N.W. Washington, D.C. 20004